CHAPTER VI

Alternatives

VI.A Introduction

The California Environmental Quality Act (CEQA) Guidelines, Section 15126.6(a), state that an environmental impact report (EIR) must describe and evaluate a reasonable range of alternatives to the proposed project that would feasibly attain most of the project's basic objectives, but that would avoid or substantially lessen any identified significant adverse environmental effects of the project. An EIR is not required to consider every conceivable alternative to a proposed project and is not required to consider alternatives that are infeasible. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation.

The EIR must evaluate the comparative merits of the alternatives and include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. Specifically, the CEQA Guidelines set forth the following additional criteria for selecting and evaluating alternatives:

- [T]he discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. (Section 15126.6(b))
- The range of potential alternatives shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. (Section 15126.6(c))
- The specific alternative of "no project" shall also be evaluated along with its impact. (Section 15126.6(e)(1))
- The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision-making. (Section 15126.6(f))

This chapter identifies alternatives to the Central SoMa Plan (the Plan) and discusses environmental impacts associated with each alternative, relative to those of the Plan.

This chapter analyzes the following alternatives to the Plan:

- No Project Alternative;
- Reduced Heights Alternative;
- Modified TODCO Plan;

SECTION VI.B Alternative 1: No Project

- Land Use Variant; and
- Land Use Plan Only Alternative.

The discussion also considers the extent to which each alternative has the ability to meet the project objectives. As discussed in Chapter II, Project Description, the Plan's eight goals are used as the project objectives. These are:

- 1. Increase the capacity for jobs and housing;
- 2. Maintain the diversity of residents;
- 3. Facilitate an economically diversified and lively jobs center;
- 4. Provide safe and convenient transportation that prioritizes walking, bicycling, and transit;
- 5. Offer an abundance of parks and recreational opportunities;
- 6. Create an environmentally sustainable and resilient neighborhood;
- 7. Preserve and celebrate the neighborhood's cultural heritage; and
- 8. Ensure that new buildings enhance the character of the neighborhood and the city.

Table VI-1, Development Assumptions for Alternatives to the Central SoMa Plan, sets forth a description of development assumptions for the alternatives and compares them to the Plan.⁴²⁰ Development assumptions underpinning the various alternatives in this chapter are derived primarily from the same Planning Department growth forecasts discussed under Analysis Assumptions in the Overview section at the start of Chapter IV, and modified based on the descriptions of the alternatives in terms of development potential, particularly on the change in permitted uses and allowable building height and bulk. Please note that the Land Use Plan Only Alternative would have the same population and employment growth, development intensity, and locations of development as the Plan. Accordingly, only a limited number of environmental effects would change under this alternative as compared to the Plan.

VI.B Alternative 1: No Project

VI.B.1 Description

CEQA Guidelines Section 15126.6(e)(3)(A) indicates that, generally, when a project being analyzed is the revision of an existing land use or regulatory plan—such as the Plan and the *Planning Code* and Zoning Map revisions that would implement the Plan—the No Project Alternative should be considered to be a continuation of the existing plan into the future. CEQA Guidelines Section 15126.6(e)(3)(A) states "Typically this is a situation where other projects initiated under the existing plan will continue while the new plan is developed. Thus, the projected impacts of the proposed plan or alternative plans would be compared to the impacts that would occur under the existing plan." Consistent with this guidance, the No Project Alternative

⁴²⁰ Development assumptions for the alternatives do not take into account the potential for application of the density bonus for affordable housing projects enabled by AB 2501.

	Central SoMa Planª	No Project Alternative	Reduced Heights Alternative	Modified TODCO Plan	Land Use Variant
Household Growth (Increase from Baseline) ^b	14,400	9,200	12,400	12,700	12,900
Difference from Plan	_	(5,200)	(2,000)	(1,700)	(1,500)
Population Growth (Increase from Baseline) ^c	25,500	16,300	21,900	22,500	22,800
Difference from Plan	_	(9,200)	(3,600)	(3,000)	(2,700)
Residential Square Feet (Increase from Baseline)	17,280,000	10,800,000	14,880,000	15,240,000	15,480,000
Difference from Plan	_	(6,480,000)	(2,400,000)	(2,040,000)	(1,800,000)
Employment Growth (Jobs) (Increase from Baseline)	63,600	27,200	55,800	56,700 ^d	66,200
Difference from Plan	_	(36,400)	(7,800)	(6,900)	2,600
Office Square Feet (Increase from Baseline)	10,430,000	5,000,000	9,151,000	9,299,000e	10,857,000
Difference from Plan	_	(5,430,000)	(1,279,000)	(1,131,000)	427,000
Non-Office Square Feet (Increase from Baseline)	4,007,000	1,900,000	3,515,000	3,572,000 ^d	4,171,000
Difference from Plan	—	(2,107,000)	(492,000)	(435,000)	164,000

 TABLE VI-1
 DEVELOPMENT ASSUMPTIONS FOR ALTERNATIVES TO THE CENTRAL SOMA PLAN

SOURCES: San Francisco Planning Department, 2013, 2016; TODCO, 2013; ESA, 2016. NOTES:

Values rounded to nearest 100; some columns and rows do not add due to rounding.

Values in parentheses represent a reduction from the Plan.

The Land Use Plan Only Alternative would have the same growth and building development characteristics as that presented for the Plan in this table. See text for additional discussion.

- a. The 2016 Central SoMa Plan is contained entirely within the boundaries of the 2013 draft Plan Area. The Department analyzed projected growth in employment and residential uses for the 2013 draft Plan and determined that 95 to 97 percent of this projected growth is anticipated to occur in the 2016 draft Plan Area. Thus, the numbers presented in this table, are conservative (i.e., higher) and would not substantively alter the conclusions reached in this EIR. These modifications to the growth assumptions would not result in substantial or more severe physical impacts for topics evaluated in the Initial Study.
- b. Assumes 95 percent occupancy of housing units.

c. Assumes 1.77 persons per household.

d. Based on same factors as in Planning Department projections.

e. From TODCO Plan, p. 9, with addition of Planning Department projected growth north of Folsom Street (primarily in C-3 use districts).

considered in this EIR, with respect to the Plan, is the maintenance of the existing zoning and height and bulk controls in the Plan Area, with no adoption of the Plan. This alternative assumes that development within the Plan Area would proceed consistent with existing land use controls, including the Western SoMa and East SoMa Area Plans and existing use and height and bulk districts. The No Project Alternative would not include implementation of the Plan's proposed street network changes, nor would the open spaces or open space improvements set forth in the Plan be expected to be implemented. Although both the East SoMa Plan and the Western SoMa Plan call for increasing the amount of open space in their respective plan areas, neither adopted area plan identifies specific park sites or open space or street network improvements are assumed under the No Project Alternative other than efforts currently under way or recently completed, such as the proposed Sixth Street Improvement Project along the western boundary of the Plan Area (which would include widened sidewalks and street tree planting), and the new Annie Alley Plaza (off of Mission Street between Second and Third Streets) and portions of San Francisco Public Works' SoMa Alleyway Improvement Project that are located in the western portion of the Plan Area, along Minna, Natoma, Tehama, Clementina, Shipley, and Clara Streets. Individual development projects under the No Project Alternative are assumed to meet Better Streets Plan requirements.

As described in the introduction to Chapter IV, the growth projections for the No Project Alternative include the addition by 2040 of approximately 9,200 households and 16,300 residents (about 36 percent less than with implementation of the Plan) and approximately 27,200 jobs (57 percent less than with the Plan). These assumptions reflect allowable development under existing zoning, allocated with respect to use according to historical development patterns in and around the Plan Area. Total floor area developed for the No Project Alternative (17.7 million square feet) would be about 44 percent less than with implementation of the Plan (31.7 million square feet).

The No Project Alternative assumes that growth in the Plan Area and the city would occur with or without implementation of the Plan, but that, absent implementation of the Plan, a smaller percentage of citywide growth would occur within the Plan Area.

VI.B.2 Alternative 1–No Project Alternative: Impacts

Land Use and Land Use Planning

The No Project Alternative would not result in any amendments to use districts as proposed by the Plan; parcels would remain zoned as they are currently. Under the No Project Alternative, the existing area plans would continue and the policies and objectives of these plans would apply to the respective areas currently within either the Western SoMa or East SoMa Area Plan boundaries as applicable. Changes in land use would be expected to occur more slowly under the No Project Alternative, compared to those with implementation of the Plan because, without changes in use districts (e.g., SLI to MUO) and increased height limits, there would be less incentive to redevelop many of the parcels in the Plan Area. Moreover, as shown in Table VI-1, less overall development would occur in the Plan Area, compared with that forecast under the Plan. Like the Plan, this alternative would not physically divide an existing community, as it would not introduce physical barriers, nor would the No Project Alternative conflict with plans adopted for the purpose of avoiding or mitigating an environmental effect, and these impacts would be less than significant.

Neither would the No Project Alternative include the Plan's proposed street network changes or open space improvements, and as a result, this alternative would not involve any construction within, or alter the physical or operational characteristics of, current public rights of way or open space areas. Consequently, the No Project Alternative would not include new mid-block crosswalks or other improvements that would improve connectivity within and adjacent to the Plan Area (Impact LU-1). Development under the Plan would result in additional traffic that would increase traffic noise levels throughout the Plan Area vicinity. As shown in Table IV-E.9, Cumulative Plus Plan Traffic Noise Analysis, under 2040 cumulative no project conditions traffic noise levels would increase by 3 dBA or more along Fourth Street between Brannan and Townsend Streets, which would be a significant and unavoidable impact and would conflict with *General Plan* policy regarding traffic noise (Impact LU-2).

Aesthetics

Under the No Project Alternative, new development that could occur would be incremental and anticipated to be similar to that which already exists in the Plan Area. Aesthetic changes would be substantially less noticeable than those of the Plan because there would be no increase in allowable building heights in the Plan Area and therefore, it would be less likely for new buildings over 85 feet in height to be developed south of Folsom Street, except potentially along the south side of Folsom Street between Hawthorne and Mabini Streets, where such heights are already allowed. Elsewhere in the Plan Area, new buildings that are taller than existing buildings could be constructed, up to a height of 85 feet along parts of Folsom, Harrison, Second, Third, and Fourth Streets, and Fifth and Sixth Streets north of Harrison Street. However, the visual changes would be less substantial than with construction of several towers of 160 feet or more in height as proposed under the Plan. It should be noted that under the No Project Alternative, existing conditions such as underutilized sites-including surface parking lots-as well as the lack of sidewalks in portions of the Plan Area, may remain unchanged in the absence of development that could occur under the proposed Plan. However, it is also possible that even without the proposed Plan, development on a site, particularly a site not currently developed to its maximum potential under existing zoning and/or height and bulk district controls, could occur and result in an intensification of use on that site. Similar to the proposed Plan, development under the No Project Alternative would not adversely affect the visual character of the Plan Area or scenic resources, nor would it substantially alter the existing public views of the Plan Area, result in substantially increased light and glare (because new development must comply with Planning Commission Resolution 9212), or make a considerable contribution to adverse aesthetic conditions in the Plan Area. Aesthetic impacts would be less than significant, as would be the case with the proposed Plan.

The No Project Alternative would not include the Plan's proposed street network changes and open space improvements, and consequently, would avoid any of the Plan's aesthetic impacts (albeit less than significant) associated with those improvements.

Cultural and Paleontological Resources

Historic Architectural Resources

Under the No Project Alternative, identified historic resources would not be included in Articles 10 and 11 of the *Planning Code*, which provide added protection to these resources. The No Project Alternative would result in less intensive development within the Plan Area than would the Plan. However, as with the Plan, subsequent development projects consistent with existing zoning and height and bulk districts could result in demolition or substantial alteration of individually identified historic architectural resources or contributing resources to a historic district or conservation district located in the Plan Area. Because the No Project Alternative would not increase the allowable building heights as would the Plan, this alternative would likely result in less development pressure for redevelopment of "underutilized" sites. It cannot be predicted that, absent the Plan and its specific policies addressing historical resources, that a resource otherwise would not or could not be demolished. Accordingly, the No Project Alternative would not necessarily avoid the Plan's significant and unavoidable impact on historic architectural resources. Cumulative impacts on historical resources would likewise be significant and unavoidable, as would be the case for the Plan. During environmental review of those subsequent development projects, project-specific mitigation measures

comparable to those identified in Section IV.C, Cultural and Paleontological Resources (avoidance or minimization of effects on historical resources, documentation of historical resource(s), creation of oral histories and/or interpretive programs, video recordation, protection of historical resources from adjacent construction activities, and implementation of construction monitoring programs for historical resources) could be imposed on individual developments, as appropriate, to reduce significant impacts on historic architectural resources. However, these comparable mitigation measures may not eliminate the significant and unavoidable impact because it cannot be known for certain whether the mitigation measures would avoid demolition or substantial alteration of a historical resource, or whether the mitigation measures would reduce potential impacts on historic districts to a less-than-significant level. Thus, the impact of the No Project Alternative on historical resources would be significant and unavoidable.

The No Project Alternative would also not include construction the Plan's proposed street network changes and open space improvements, and consequently, would avoid construction-related impacts to architectural historical resources (albeit less than significant) associated with those improvements.

Archeological Resources, Human Remains, and TCRs

The No Project Alternative would result in less development within the Plan Area than would the Plan. However, as with the Plan, subsequent development projects completed consistent with existing zoning could result in excavation that might disturb prehistoric and/or historic-period archeological resources, human remains, and/or tribal cultural resources; any of these occurrences could result in a significant impact. During environmental review of those subsequent development projects, project-specific mitigation measures that have been adopted through East SoMa and West SoMa Plan implementation comparable to those identified in Section IV.C, Cultural and Paleontological Resources (preparation of a project-specific Preliminary Archeological Assessment and implementation of procedures for accidental discovery of archeological resources) would be expected to reduce this impact of projects in the Plan Area to a less-than-significant level. Cumulative impacts would likewise be less than significant with mitigation, as with the Plan.

The No Project Alternative would also not include construction the Plan's proposed street network changes and open space improvements, and consequently, would avoid the significant but mitigable impacts to archeological resources, and the less-than-significant impacts to human remains and tribal cultural resources, associated with construction of those improvements.

Paleontological Resources

As noted above, the No Project Alternative would result in less development than would the Plan, as well as none of the Plan's street network changes and open space improvements. Impacts on paleontological resources would be less than significant, both for this alternative and cumulatively, as would be the case with the Plan, given the low sensitivity of Plan Area soils for such resources.

Transportation and Circulation

VMT

Under the No Project Alternative, residential growth in the Plan Area would be about 36 percent less and employment growth would be about 57 percent less by 2040 than is assumed under the Plan. As with the Plan, the average daily VMT per capita for conditions without the Plan would be substantially lower than the Bay Area regional average for the residential, office, and retail land uses (see Table IV.D-6, Average Daily VMT per Capita, SF-CHAMP Model Data, Existing (2012) and 2040 Conditions, in Section IV.D, Transportation and Circulation). Under the No Project Alternative, average daily VMT per capita would be slightly greater than for the Plan for the residential (2.1 versus 1.9 VMT per capita) and retail (4.4 versus 4.2 VMT per capita) categories, and slightly lower in the office category (8.2 versus 8.7 VMT per capita). Thus, as with the Plan, the No Project Alternative would not include any transportation features that would substantially induce automobile travel, but would lack the street network changes proposed under the Plan the Plan the No Project Alternative related to VMT would be less than significant, as would be the case with the Plan.

Traffic Hazards

Under the No Project Alternative, development of the residential and non-residential land uses would not introduce unusual design features, and, with the new development, the study area traffic hazards would remain similar to existing conditions. As with the Plan, increases in vehicle, pedestrian and bicycle travel associated with new development would result in the potential for increased vehicle-pedestrian and vehicle-bicycle conflicts, but these increases would not be considered a new traffic hazard. The No Project Alternative would lack the street network changes proposed under the Plan that would help further reduce the number of conflicts. Thus, the impact related to traffic hazards under the No Project Alternative would be less than significant, as would be the case with the Plan.

Transit

Under the No Project Alternative, transit ridership would increase about 22 percent less than with implementation of the Plan. While there would be less development and fewer transit trips under the No Project Alternative than for the Plan, the additional transit trips would result in significant impacts to Muni downtown screenlines and Central SoMa cordons under No Project and 2040 cumulative conditions, although to a lesser extent than would be the case with the Plan. However, the No Project Alternative would not result in significant impacts to regional transit capacity utilization under existing plus No Project and 2040 cumulative conditions, and therefore, cumulative impacts related to regional transit capacity utilization under the No Project Alternative would be less than significant.

As with the Plan, development in the Plan Area under the No Project Alternative would increase traffic congestion, causing delays for Muni buses and regional transit carriers that operate on city streets (i.e., Golden Gate Transit and SamTrans), a significant and unavoidable impact. There would be no mechanism for plan-level mitigation measures under the No Project Alternative, thus the mitigation measures identified for the Plan would not be implemented, and transit capacity impacts would be significant and unavoidable. The

No Project Alternative also would not include the Plan's proposed transit improvements, including dedicated transit lanes and bus bulbs at select locations, and would result in fewer benefits to transit service.

Pedestrian and Bicycle Impacts

In terms of pedestrian and bicycle operations, the No Project Alternative would result in about three-fourths of the Plan's travel by these modes. As discussed above, the No Project Alternative would not implement the Plan's proposed street network changes including new bicycle lanes and cycle tracks, widened sidewalks, and new mid-block crosswalks. The No Project Alternative would not avoid the Plan's significant impacts with respect to pedestrian crowding in crosswalks under existing plus Plan and 2040 cumulative conditions, and would also result in significant impacts at one or more sidewalk and corner locations under 2040 cumulative conditions. Therefore, pedestrian impacts would be significant and unavoidable under the No Project Alternative.

The growth in bicycle travel would also be less substantial under the No Project Alternative, compared to conditions with the Plan. However, as noted above, this alternative would not implement the Plan's bicycle improvements, which would reduce the degree to which the No Project Alternative would improve conditions for bicycling, compared to the Plan. Nevertheless, it is anticipated that bicycle-related impacts of the No Project Alternative would be less than significant, as under the Plan.

Loading

With less development than under Plan implementation, the No Project Alternative would result in less growth in demand for off-street freight loading spaces, on-street commercial loading spaces, and passenger loading/unloading spaces. As discussed above, because the No Project Alternative would not include the street network improvements, and thus not remove on-street commercial loading spaces and passenger loading/unloading zones, this alternative would avoid the Plan's significant and unavoidable impact. Therefore, impacts of the No Project Alternative related to loading would be less than significant.

Parking

Development in the Plan Area under the No Project Alternative would increase parking demand, not all of which would be expected to be met on-site within new developments, given that *Planning Code* parking controls in the Plan Area govern maximum amounts of parking and do not generally require any off-street parking. Under the No Project Alternative, the increase in parking demand would be less than with implementation of the Plan. Further, the No Project Alternative would not include the Plan's street network changes, which would result in permanent removal of about 200 on-street parking spaces on Harrison, Bryant, Brannan, Second, Third, Fourth, and Sixth Streets; and prohibit peak-period use for another approximately 400 on-street spaces. Therefore, inasmuch as parking-related impacts of the Plan would be less than significant, the No Project Alternative would also have a less-than-significant impact with respect to parking.

Emergency Vehicle Access

While development in the Plan Area would not introduce unusual design features or change the Plan Area street network as to hinder or preclude emergency vehicle access, such development would increase traffic

volumes. California law requires that drivers yield the right-of-way to emergency vehicles and emergency vehicles would be able to travel within transit-only lanes, and fire and rescue vehicles would be able to mount the raised separation between vehicle travel lanes and any protected cycle track or transit-only lanes. Although traffic congestion could slow emergency vehicle response times, it would not impede emergency vehicle access. The No Project Alternative would result in less development in the Plan Area than would occur with Plan implementation and would not include the proposed street network changes that would remove mixed-flow travel lanes. Because it is the combination of Plan growth plus the street network changes that results in a significant Plan impact, impacts on emergency vehicle access would be less than significant under the No Project Alternative.

Construction Impacts

Under the No Project Alternative, less development would occur within the Plan Area than under the Plan, and the street network changes would not be implemented. However, there are a number of development projects on file within the Plan Area, as described in Chapter IV, Overview. These projects are dependent on the Plan's proposed zoning, and under the No Project Alternative, zoning and height limits would not change. Therefore, under the No Project Alternative, many of these projects would not move forward as currently proposed, and the overall pace and intensity of development are likely to be less. Although significant construction-related impacts could occur, it is likely that mitigation measures similar to Mitigation Measure M-TR-9, Construction Management Plan and Construction Coordination, to reduce construction effects would be applied on a project-by-project basis. It is anticipated that due to slower pace of development, implementation of Mitigation Measure M-TR-9 would be able to reduce the impact to less than significant.

Noise and Vibration

Build out of the respective existing area plan portions of the Plan Area under the No Project Alternative would result in less traffic-generated noise, compared to that under Plan, such that noise impacts from traffic would be less than significant. However, under cumulative conditions, traffic noise associated with No Project Alternative would be significant, as with the Plan, because traffic from cumulative development without the Plan would result in an increase in noise of more than 3 dBA on one of the Plan Area roadway study segments (Fourth Street between Brannan and Townsend Streets). Nevertheless, the No Project Alternative would avoid the Plan's significant and unavoidable traffic noise impact on Howard Street. While subsequent environmental review may identify impacts with regard to noise, there is no guarantee that impacts from a subsequent development project could be mitigated to a less-than-significant level. Because the degree to which vehicle trips (and their associated noise levels) could be reduced by future mitigation or identified TDM Plan cannot be reliably estimated, and because no other feasible mitigations are available, cumulative traffic noise under the No Project Alternative would result in a significant and unavoidable impact to existing noise-sensitive uses.

Under the No Project Alternative, zoning would not change, and therefore, the mixed-use zoning proposed by the Plan, which allows residential uses in proximity to other noise generating uses (e.g., PDR and entertainment), would not be implemented. Therefore, there would be less potential for incompatible uses co-locating within the same use district. New noise-generating uses developed under the No Project Alternative would be subject to the *San Francisco Building Code, San Francisco Green Building Code,* and

Regulation of Noise from Places of Entertainment, which would reduce impacts on sensitive land uses to a less-than-significant level. New noise-sensitive land uses would be required to comply with existing noise control standards and would not be significantly affected, similar to the conclusions reached for the Plan.

As with the Plan, construction noise and construction vibration impacts would be addressed with implementation of mitigation measures on a project-specific basis. Under the No Project Alternative, construction noise mitigation measures similar to **Mitigation Measure M-NO-2a**, **General Construction Noise Control Measures**, and **Mitigation Measure M-NO-2b**, **Noise and Vibration Control Measures during Pile Driving**, would be applied to subsequent development projects to reduce construction noise effects. It is anticipated that due to slower pace of development, implementation of Mitigation Measures M-NO-2a and M-NO-2b would be able to reduce construction noise impacts to less than significant.

As noted in the description of this alternative, the No Project Alternative assumes that growth in the Plan Area and the city would occur with or without implementation of the Plan, but that, if the Plan is not adopted, less growth—5,200 fewer households and 5.4 million fewer square feet of commercial space—would occur within the Plan Area than would occur with implementation of the Plan. Therefore, this alternative could result in incrementally greater increases in traffic noise outside the Plan Area as a result of such development occurring outside the Plan Area. It can reasonably be anticipated that much of this development would occur within other parts of the city where area plans have been adopted in recent years, such as the remainder of East SoMa and Western SoMa, as well as the Transit Center District, the Central Waterfront (including Dogpatch), the Mission, and the Market and Octavia Plan Area, as well as within Downtown.

Air Quality and Greenhouse Gas Emissions

The relative reduction in vehicle trip generation under the No Project Alternative could also reduce local emissions of criteria air pollutants, greenhouse gases (GHGs), and traffic-generated toxic air contaminants (TACs). As with the Plan, VMT would increase by a lesser percentage (13.2 percent) than the service population (75 percent).⁴²¹ Future projects under the No Project Alternative would be subject to existing City programs that reduce criteria pollutant emissions and GHGs, as is described in Section IV.F, Air Quality, and in Section D.8, Greenhouse Gas Emissions, of the Initial Study (Appendix B). However, the potential would remain for one or more subsequent individual development projects in the Plan Area, if large enough, to violate an air quality standard, contribute to an existing or projected air quality violation, and/or result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State ambient air quality standard. Unlike the Plan, no mitigation measures would apply in the form of a project-specific Transportation Demand Management Program (TDM) and associated reduction in vehicle trips would not be expected.⁴²² In the absence of certainty that emissions from every subsequent development project would be below the applicable significance thresholds, this would be a significant and unavoidable impact of the No Project Alternative.

⁴²¹ Service population is the combined household population plus employment.

⁴²² As noted in Chapter II, Project Description, the City is anticipated to adopt an ordinance by end of 2016 that would mandate TDM Programs in many new development projects.

Construction emissions of criteria pollutants from subsequent development projects would be less substantial under this alternative than with the Plan; also as with the Plan, construction emissions could be significant but available mitigation measures would likely be identified pursuant to individual project review under CEQA that would reduce the impact to a less-than-significant level.

As with the Plan, operation of subsequent developments could generate particulates and TACs that would worsen air quality and adversely affect sensitive receptors. While subsequent environmental review may identify impacts with regard to TAC exposure, there is no guarantee that such an exposure from a future subsequent development project could be mitigated to a less-than-significant level. Similar to the Plan, mobile sources generated by the future development projects under the No project Alternative could significantly affect the geography and severity of the Air Pollutant Exposure Zone. Because the degree to which trips (and thereby emissions) could be reduced by future mitigation or an identified TDM cannot be reliably estimated at this point, and because vehicle emissions are regulated at the State and federal level and local jurisdictions are preempted from imposing stricter emissions standards for vehicles, and because no other feasible mitigations are available, the impact of traffic-generated TACs would be significant and unavoidable. Construction-related emissions of particulates and TACs under the No Project Alternative would be significant, as with the Plan, but would likewise be mitigated to a less-than-significant level with implementation of mitigation measures identified during CEQA review for those projects that are similar to Mitigation Measure M-AQ-7, Construction Emissions Minimization Plan.

Impacts related to greenhouse gas emissions would be less than significant, as with the Plan, given that subsequent development projects would be required to comply with the City's Greenhouse Gas Reduction Strategy.

It is noted that, to the extent that development that may be precluded under the No Project Alternative from taking place in the Plan Area were to occur elsewhere in the Bay Area, particularly in outlying, less dense locations that are less well-served by transit, employees and residents of such developments could generate substantially greater impacts on air quality (specifically, regional criteria pollutants) and greenhouse gases than would be the case if a similar amount of office space, other non-residential space, or residential uses were developed in the Plan Area. The operational impacts of this type of development pattern would be relatively greater because lower office and residential densities reduces transit viability, making it likely that equivalent amounts of commercial and residential development would result in more vehicle trips in other locations increasing VMT and associated air pollutants. To the extent that the development could hinder meeting *Plan Bay Area*'s regional GHG per capita targets. This could be a significant, albeit indirect and somewhat speculative, impact of the No Project Alternative.

Wind

While future construction would still take place under the No Project Alternative, this alternative would not increase allowable building heights within the Plan Area. In particular, this alternative would not permit buildings up to 400 feet in height, as would the Plan. The Plan, as analyzed in this EIR, also allows for four towers of 200, 240, 350, and 350 feet in height on the south side of Harrison Street between Second and Fourth Streets. Instead, height limits would remain as under existing conditions, at 85 feet or less from Harrison Street south, from Folsom Street south (to the west of Fourth Street), and from Howard Street south (to the west of

Fifth Street). Because buildings less than approximately 100 feet tall rarely result in wind hazard conditions and typically cause relatively minor changes in pedestrian level winds, the No Project Alternative would be unlikely to result in substantial wind effects in these areas, and thus wind impacts would be less than significant. This alternative, therefore, would eliminate a significant and unavoidable wind impact of the Plan.

Shadow

The No Project Alternative would substantially reduce shadow impacts compared to the Plan, though the Plan itself would result in less-than-significant shadow impacts. The maximum existing height limit in the Plan Area south of Folsom Street would largely remain at 85 feet or less. Structures built to existing height limits could cast small amounts of new shadow on certain parks and open spaces—notably South Park, but also including Gene Friend Recreation Center, and, potentially, Victoria Manalo Draves Park. Some shadow could be cast on South Park by structures only 40 feet tall, which would not be subject to the requirements of *Planning Code* Section 295. However, even with such development, South Park would maintain substantial mid-day sunlight throughout the year.

At Gene Friend Recreation Center, similar to the impact under the Plan, new buildings constructed across Sixth Street at the existing 85-foot height limit would cast shadow on portions of the Center in the early morning during much of the year. However, this new shadow would leave the park by shortly after 9:00 a.m., when this facility opens to the public. At Victoria Manalo Draves Park, development at the existing 85-foot height limit on the east side of Sixth Street between Folsom and Harrison Streets could potentially add new shadow very early in the morning (before 7:00 a.m.) for a few weeks around the summer solstice on June 21. However, new shadow would be very limited in time and extent. Therefore, impacts of No Project Alternative on Victoria Manalo Draves Park would be less-than-significant.

Under the No Project Alternative, shadow effects on Yerba Buena Gardens would be less than under the Plan, or may not occur, since much of the Plan's (less than significant) shadow impact on Yerba Buena Gardens would be from new buildings on Harrison Street and Fourth Street that would not be allowed under the No Project Alternative. Neither would new shadow reach the Alice Street Community Gardens, as only a small amount of shadow would occur under the Plan. Shadow impacts on streets and sidewalks would be reduced under the No Project Alternative, because building height limits would not be increased and shadows would not be as long as the shadows cast by taller buildings that could be developed under the Plan. Overall, shadow impacts would be substantially less severe than with the Plan, and thus shadow impacts of the No Project Alternative would be less than significant as are shadow impacts of the Plan.

Hydrology and Water Quality (Sea Level Rise and Combined Sewer System)

As discussed in Section IV.I, Hydrology and Water Quality, future flooding in the Plan Area from sea level rise could occur due to low points along the northern Mission Creek shoreline that could provide pathways for inundation. Development under the No Project Alternative, as under the Plan, would not alter the northern shoreline of Mission Creek. Further, the Plan Area is entirely developed and future development activities would not likely raise or lower the ground surface in a manner that would redirect flood flows. As with implementation of the Plan, development under the No Project Alternative could be affected by future sea level rise. However, consistent with the California Supreme Court's decision in *California Building Industry*

Association v. Bay Area Air Quality Management District,⁴²³ this would not be a significant effect under CEQA, because development pursuant to the No Project Alternative would not significantly exacerbate this existing environmental hazard. As under existing conditions, projects located in areas that are currently prone to flooding from the combined sewer system during wet weather would be reviewed by the SFPUC during the project approval process and may require additional actions such as incorporation of a pump station for sewage flows, raised elevation of entryways, special sidewalk construction, and deep gutters. These measures would reduce the potential for localized flooding. Therefore, impacts of the No Project Alternative related to flooding would be less than significant, as under the Plan.

With respect to the capacity of the combined sewer system, particularly during wet weather, as stated in Section IV.I, Hydrology and Water Quality, the volume of wastewater produced under the No Project Alternative would be approximately the same as existing conditions. There would be no substantial change in stormwater flows to the combined sewer system because there would be less development in the Plan Area compared to the Plan. Thus, impacts related to an increase in combined sewer discharges under the No Project Alternative would be less than significant, as under the Plan.

Issues Analyzed in the Initial Study

Impacts Related to the Intensity of Development

Impacts related to utilities and service systems, and public services (discussed in the Initial Study; see Appendix B) would be less substantial than those of the Plan, given the reduced intensity of development; these impacts would be less than significant, as with the proposed Plan. Regarding recreation, less growth under the No Project Alternative would result in less demand on existing recreational facilities. However, because this alternative would not include a program for creation of new parks or open space, future conditions would be somewhat worse than with the Plan. On balance, however, recreation impacts would be similarly less than significant.

Impacts Related to Site-Specific Conditions

Impacts related to site-specific conditions, such as those related to biology, geology and soils, hydrology and water quality, and hazardous materials would be similar to or less severe than those of the Plan because many of the same sites could be subject to future development. While the No Project Alternative would not construct new high-rise buildings taller than 85 feet south of the south side of Folsom Street, excavation and foundation systems (and, therefore, ground-disturbing activities) would likely be similar in many instances to those with development pursuant the Plan, and therefore geologic and soils impacts would be similar. **Mitigation Measures M-BI-1, Pre-construction Bat Surveys**, and **M-HZ-3, Hazardous Building Materials Abatement**, would be applicable on a project-specific basis through project review under CEQA, as with the Plan and, in the case of biological resources and hazardous materials, impacts of the No Project Alternative would be less than significant with mitigation, as with the Plan. Impacts on geology and hydrology and water quality would be less than significant, as with the Plan.

⁴²³ California Building Industry Association v. Bay Area Air Quality Management District, 62 Cal.4th 369. Opinion Filed December 17, 2015.

As with the Plan, the No Project Alternative would have less-than-significant impacts related to mineral and energy resources and no impacts on agricultural or forest resources, because of the lack of these kinds of resources in the Project area.

Project Objectives

The No Project Alternative would accommodate substantially fewer jobs and less new housing than the Plan. As described in the introduction to Chapter IV, the No Project Alternative would result in 36 percent fewer additional households than the Plan (i.e., 9,200 vs. 14,400 households), and 57 percent fewer additional jobs than the Plan (27,200 vs. 63,600 jobs). As such, this alternative would be less successful than the Plan in "increas[ing] the capacity for jobs and housing" (Objective 1) and "facilitat[ing] an economically diversified and lively jobs center (Objective 3). Because the No Project Alternative would not include the Plan's proposed street network changes (including those that incentivize walking, bicycling and transit) or open space improvements, the No Project Alternative would not "provide safe and convenient transportation that prioritizes walking, bicycling, and transit" (Objective 4) or "offer an abundance of parks and recreational opportunities" (Objective 5). Additionally, the No Project Alternative would not necessarily "create an environmentally sustainable and resilient neighborhood" (Objective 6), as it would not establish an Eco-District in the Plan Area, including an implementing entity, with a commitment and strategy to become a sustainable and resilient neighborhood. Without the Plan's proposed height limit increases, the No Project Alternative would not "ensure that new buildings enhance the character of the neighborhood and the city" (Objective 8), as it would not result in an "overall development pattern... complementary to the skyline" (Plan Objective 8.2), nor would it "reinforce the character of Central SoMa as a mid-rise district with tangible 'urban rooms'" (Plan Objective 8.3) or use urban form to emphasize important nodes, such as the Central Subway. Accordingly, the No Project Alternative would not meet most of the basic project objectives. The No Project Alternative would, however, continue to reflect the objectives established for each of the existing East SoMa and Western SoMa Plan Areas.

VI.C Alternative 2: Reduced Heights Alternative

VI.C.1 Description

The Reduced Heights Alternative would result in implementation of the same land use districts and General Plan amendments as under the Plan, except for text and height amendments that relate to maximum permitted building heights as well as building bulk (regulated through the use of floor-plate size restrictions and required setbacks) within Plan Area height districts. Proposed height limits under the Reduced Heights Alternative are shown in **Figure VI-1**, **Reduced Heights Alternative Height Districts Map**.



SOURCE: San Francisco Planning Department

Case No. 2011.1356E: Central SoMa Plan

Figure VI-1 Reduced Heights Alternative Height Districts Map The Reduced Heights Alternative would permit fewer tall buildings south of the elevated Interstate 80 freeway than would be allowable under the Plan. Both the Reduced Heights Alternative and the Plan would increase height limits along much of Fourth, Harrison, and Bryant Streets from 65 feet to 85 feet. However, the Reduced Heights Alternative would allow for four towers of 160 feet or more in height south of the freeway, whereas the Plan would allow up to 10 such towers in this area. Also, on the south side of Harrison Street between Second and Fourth Streets, the Reduced Heights Alternative would allow future buildings at heights no greater than 130 feet, whereas the Plan would allow for four towers 160 feet tall and greater. The maximum height allowed under this alternative would be 320 feet (at the corner of Fourth and Townsend Streets). The Reduced Heights Alternative would include the same street network changes and open spaces improvements that are proposed under the Plan.

This alternative assumes the same sites would be developed as under the Plan, although at a lower intensity, resulting in marginally less development than that assumed under the Plan. Growth projections for the Reduced Heights Alternative estimate an increase of 12,400 households and approximately 55,800 jobs, reflecting 14 percent fewer households and 12 percent fewer jobs than the Plan. Total floor area developed under the Reduced Heights Alternative would be about 13 percent less than with implementation of the Plan.

VI.C.2 Alternative 2—The Reduced Heights Alternative: Impacts

Land Use and Land Use Planning

Land use impacts would be similar under the Reduced Heights Alternative, which would include the same changes in use districts as the Plan and would also increase height limits, albeit to a somewhat lesser degree. The Reduced Heights Alternative would allow for the same mix of land uses allowed under the Plan, and therefore there could be conflict with noise sensitive uses co-located with noise-generating uses. **Mitigation Measure M-NO-1b**, **Siting of Noise-Generating Uses**, combined with the *San Francisco Building Code*, *San Francisco Green Building Code*, and Regulation of Noise from Places of Entertainment, would reduce impacts on sensitive land uses to a less-than-significant level. Also like the Plan, this alternative would not physically divide an existing community, as it would not introduce physical barriers. Because it would include the street network changes, the Reduced Heights Alternative would conflict with plans adopted for the purpose of avoiding or mitigating an environmental effect, should the Howard and Folsom Streets two-way street network change option be implemented. This alternative, like the Plan, would result in a significant unavoidable conflict with *General Plan* policy regarding traffic noise.

Aesthetics

Aesthetic impacts would be less than significant, as with Plan, and impacts would not be substantially different from those of the Plan. As can be seen in the visual simulations from long-range viewpoints (see **Figure VI-2, Long-Range Visual Simulation: View North from Texas Street and 19th Street**, and **Figure VI-3, Long-Range Visual Simulation: View East from Corona Heights Park**), from a distance the differences between a 400-foot-tall tower and a 320-foot-tall tower would not be readily apparent. In addition, the more modest increases in height that would be allowed under the Reduced Heights Alternative would







SOURCE: Square One, 2016

Case No. 2011.1356E: Central SoMa Plan Figure VI-2 Long-Range Visual Simulation: View North from Texas Street and 19th Street







Case No. 2011.1356E: Central SoMa Plan Figure VI-3 Long-Range Visual Simulation: View East from Corona Heights Park

SOURCE: Square One, 2016

generally result in a less pronounced urban form in distant views. Similar to the Plan, buildings would be subject to bulk sculpting measures. In the mid-range views from the Interstate 280 overpass near Sixth and Brannan Streets and from the Bay Bridge (see Figure VI-4, Mid-Range Visual Simulation: View North from Interstate 280 Sixth Street Off-Ramp, and Figure VI-5, Mid-Range Visual Simulation: View West from Interstate 80 Westbound), the fewer towers would be more apparent but would not substantially change the overall views, compared to the Plan. In closer-range views, the difference between the Plan and the Reduced Heights Alternative would be less perceptible from the pedestrian perspective because the field of vision is generally more limited from the ground level. As such, development that would be allowed under the Reduced Heights Alternative and the Plan would not be readily discernible from the pedestrian perspective (see Figure VI-6, Short-Range Visual Simulation: View East from Brannan Street and Sixth Street, and Figure VI-7, Short-Range Visual Simulation: View North from Fourth Street and Townsend Street). Therefore, as with the Plan, development under the Reduced Heights Alternative would not adversely affect the visual character of the Plan Area or scenic resources. The Reduced Heights Alternative would not substantially alter the public views of the Plan Area, result in substantially increased light and glare, or make a considerable contribution to adverse aesthetic conditions in the Plan Area, and these impacts would be less than significant.

Cultural and Paleontological Resources

Historic Architectural Resources

Because the Reduced Heights Alternative would likely involve subsequent future projects at the same or very similar development sites as the project, albeit at reduced heights and densities on certain specific sites, this alternative, like the Plan, would result in a significant and unavoidable impact, with mitigation, on historic architectural resources associated with the potential demolition or substantial alteration of historical resources. Thus, there exists the potential for subsequent projects to materially impair historic resources through demolition or substantial alteration, a significant impact. Cumulative impacts on historical resources would likewise be significant and unavoidable with mitigation, as would be the case for the Plan. Mitigation Measures M-CP-1a, Avoidance or Minimization of Effects on Identified Historical Resources; M-CP-1b, Documentation of Historical Resource(s); M-CP-1c, Oral Histories; M-CP-1d, Interpretive Program; and M-CP-1e, Video Recordation, would apply with respect to direct effects on historical resources, while Mitigation Measures M-CP-3a, Protect Historical Resources from Adjacent Construction Activities, and M-CP-3b, Construction Monitoring Program for Historical Resources, would apply with respect to indirect, construction-related effects. However, these measures would not fully mitigate the impact because, as with the Plan, under the Reduced Heights Alternative material impairment of an historic architectural resource through demolition or substantial alteration would result in a significant impact; therefore, even with implementation of these mitigation measures, the impact would remain significant and unavoidable.







SOURCE: Square One, 2016

Case No. 2011.1356E: Central SoMa Plan Figure VI-4 Mid-Range Visual Simulation: View North from Interstate 280 Sixth Street Off-Ramp







Case No. 2011.1356E: Central SoMa Plan Figure VI-5 Mid-Range Visual Simulation: View West from Interstate 80 Westbound

SOURCE: Square One, 2014



Case No. 2011.1356E: Central SoMa Plan Figure VI-6 Short-Range Visual Simulation: View East from Brannan Street and Sixth Street



SOURCE: Square One, 2014

Case No. 2011.1356E: Central SoMa Plan Figure VI-7 Short-Range Visual Simulation: View North from Fourth Street and Townsend Street

Archeological Resources, Human Remains, and TCRs

The Reduced Heights Alternative would also result in comparable impacts to those of the Plan on prehistoric and/or historic-period archeological resources, human remains, and/or tribal cultural resources because most of the same sites would be developed and similar construction techniques and foundation systems would likely be employed. As with the Plan, this impact would be reduced to a less-than-significant level through implementation of **Mitigation Measures M-CP-4a**, **Project-Specific Preliminary Archeological Assessment**, and **M-CP-4b**, **Procedures for Accidental Discovery of Archeological Resources**. Cumulative impacts would likewise be less than significant with mitigation, as with the Plan.

Paleontological Resources

Impacts on paleontological resources would be less than significant, both for this alternative and cumulatively, as would be the case with the Plan, given the low sensitivity of Plan Area soils for such resources.

Transportation and Circulation

VMT

Under the Reduced Heights Alternative, residential growth in the Plan Area would be about 14 percent less and employment growth would be about 12 percent less by 2040 than is assumed under the Plan. As with the Plan, the average daily VMT per capita for the Reduced Heights Alternative would be substantially lower than the Bay Area regional average for the residential, office, and retail land uses, and the Reduced Heights Alternative would meet the *Plan Bay Area* goal of reducing residential VMT per capita by 10 percent compared to year 2005 levels. In addition, the street network changes under the Reduced Heights Alternative would not substantially induce automobile travel, as with the Plan. Thus, impacts related to VMT under the Reduced Heights Alternative would be less than significant, as would be the case with the Plan.

Traffic Hazards

Under the Reduced Heights Alternative, development projects and the proposed street network changes would not introduce unusual design features that would create a traffic hazard. As with the Plan, increases in vehicle, pedestrian and bicycle travel associated with new development would result in the potential for increased vehicle-pedestrian and vehicle-bicycle conflicts, and increased average vehicle delays at intersections, but these increases would not be considered new or a substantial worsening of a traffic hazard. Thus, the impact related to traffic hazards under the Reduced Heights Alternative would be less than significant, as would be the case with the Plan.

Transit

Transit ridership would increase about eight percent less than with implementation of the Plan. The relative reduction in ridership would avoid the Plan's significant impact on Muni capacity utilization on some, but not all, screenlines and corridors under existing plus Plan and 2040 cumulative conditions. As with the Plan, the Reduced Heights Alternative would also result in significant impacts on regional transit (i.e., BART) capacity utilization under existing plus Reduced Heights Alternative and 2040 cumulative conditions. Therefore,

impacts related to local and regional transit capacity utilization under the Reduced Heights Alternative would be significant and unavoidable with mitigation, as with the Plan, and **Mitigation Measure M-TR-3a**, **Transit Enhancements**, would be applicable to the Reduced Heights Alternative. The Reduced Heights Alternative would include the same transit improvements proposed with the Plan, including dedicated transit lanes and bus bulbs at select locations, as part of the street network improvements.

Also as with the Plan, development in the Plan Area under the Reduced Heights Alternative would increase traffic congestion, causing delays for Muni buses and regional transit carriers that operate on city streets (Golden Gate Transit and SamTrans), a significant impact under existing plus Plan and 2040 cumulative conditions. Implementation of **Mitigation Measures M-TR-3a**, **Transit Enhancements**; **M-TR-3b**, **Boarding Improvements**; **M-TR-3c**, **Signalization and Intersection Restriping at Townsend/Fifth Streets**; and **M-TR-3d**, **Implement Tow-away Transit-only Lanes on Fifth Street**, could reduce peak-period transit delays on Muni, Golden Gate Transit, and SamTrans routes; however, the feasibility of these measures is uncertain, both because it is not known whether or how much additional funding could be made available and because physical improvements would be the responsibility of the SFMTA. Thus, these measures are not certain to adequately mitigate the impacts to less–than-significant levels. Therefore, transit impacts on Muni, Golden Gate Transit, and SamTrans would be significant and unavoidable.

Pedestrian and Bicycle Impacts

In terms of pedestrian and bicycle operations, the Reduced Heights Alternative would result in about eight percent less travel by these modes in 2040, compared to the Plan, and would implement the same proposed street network changes, including new bicycle lanes and cycle tracks, widened sidewalks, and new mid-block crosswalks. With incrementally less development in the Plan Area by 2040, the Reduced Heights Alternative would not avoid the Plan's significant impacts with respect to pedestrian crowding in crosswalks under existing plus Plan and 2040 cumulative conditions. Pedestrian impacts under the existing plus Plan and 2040 cumulative conditions. Pedestrian and unavoidable with mitigation under the Reduced Heights Alternative, as with the Plan, and **Mitigation Measure M-TR-4**, **Upgrade Central SoMa Crosswalks**, would be applicable to the Reduced Heights Alternative.

Bicycle travel would also be incrementally less frequent under the Reduced Heights Alternative, compared to conditions with the Plan, and the facilities that would be provided would be similar. Inasmuch as the Plan would result in less-than-significant impacts with respect to bicycle conditions, bicycle-related impacts of the Reduced Heights Alternative would also be less than significant.

Loading

With incrementally less development than under the Plan, the Reduced Heights Alternative would result in less growth in demand for off-street freight loading spaces, on-street commercial loading spaces, and curb space for passenger loading/unloading zones. To the extent that loading demand is not accommodated off-street within new development, it would need to be accommodated within existing or new on-street commercial loading spaces, the supply of which the SFMTA could increase in the future to accommodate increased demand, if warranted. However, with the same street network changes as the Plan, about 60 existing on-street freight loading zones would be removed under the Reduced Heights Alternative, as would a number of on-street passenger loading zones, to implement the proposed street network changes, and other

commercial loading spaces and passenger loading/unloading zones would be unavailable during peak periods. This could result in double parking that could adversely affect local vehicular, transit, and bicycle circulation, particularly on streets with transit-only and bicycle lanes, and would result in a significant loading impact even with mitigation. Because the Reduced Heights Alternative would include the same street network improvements, and because it would include only incrementally less development than the Plan, the Reduced Heights Alternative's impact on loading would be significant and unavoidable with mitigation, and **Mitigation Measures M-TR-6a, Driveway and Loading Operations Plan**, and **M-TR-6b, Accommodation of On-street Commercial Loading Spaces and Passenger Loading/Unloading Zones**, would apply to the Reduced Heights Alternative.

Parking

The Reduced Heights Alternative would increase parking demand by about 10 percent less than the Plan. Because parking-related impacts from the Plan would be less than significant, the Reduced Heights Alternative would also have a less-than-significant impact with respect to parking.

Emergency Vehicle Access

While development in the Plan Area would not introduce unusual design features or change the Plan Area street network as to hinder or preclude emergency vehicle access, such development would increase traffic volumes, and implementation the proposed street network changes under the Reduced Heights Alternative would reduce the number of mixed-flow travel lanes on some streets. While emergency vehicles would be able to travel within transit-only lanes, and fire and rescue vehicles would be able to mount the raised separation between vehicle travel lanes and any protected cycle track or transit-only lanes, it is likely that increased traffic congestion combined with reduced roadway capacity dedicated to motor vehicles would occasionally impede emergency vehicle access in the Plan Area during peak periods of traffic with the Reduced Heights Alternative, a significant impact. While the Reduced Heights Alternative would result in incrementally less development than with the Plan, impacts related to emergency access would be significant due to increased congestion and the street network changes, as with the Plan. Mitigation Measure M-TR-8, Emergency Vehicle Access Consultation, would ensure that the final design of each street network project would adequately meet emergency provider needs considering the location of the proposed street network project, the number of mixed-flow travel lanes available to general traffic, and raised buffers between the mixed-flow travel lanes and transit-only lanes and/or cycle tracks, and would not result in secondary transportationrelated impacts. This measure would apply to the Reduced Heights Alternative and therefore, for the same reasons as with the Plan, impacts related to emergency vehicle access would be less than significant with mitigation, as under the proposed Plan.

Construction Impacts

Construction activities associated with the Reduced Heights Alternative would be similar to those described for the Plan, though somewhat less intensive due to the fewer tall buildings that would be possible to construct under this alternative than under the Plan. Though the Reduced Heights Alternative would result in less development intensity than the Plan, development under the Reduced Heights Alternative could still result in several construction projects (development projects and street improvement projects) to occur simultaneously in close proximity to each other within the Plan Area, and result in significant constructionrelated transportation impacts, including potential disruption of traffic, transit, pedestrian, and bicycle circulation. **Mitigation Measure M-TR-9, Construction Management Plan and Construction Coordination**, would apply to the Reduced Heights Alternative, and construction-related transportation impacts under existing plus Reduced Heights Alternative would remain significant and unavoidable with mitigation as with the Plan. As with the Plan, development under the Reduced Heights Alternative, in combination with construction of other projects outside of the Plan Area would not result in significant cumulative constructionrelated transportation impacts.

Noise and Vibration

Traffic-generated noise would be essentially the same under the Reduced Heights Alternative as under the Plan, and would be significant and unavoidable, as with the Plan, because traffic generated under the Reduced Heights Alternative, while marginally lower in volume on at least some streets, would result in a noise increase in excess of 3 dBA on one or more street segments along Howard Street under the Howard and Folsom Streets two-way option. (As with the Plan, traffic noise with the Howard and Folsom Streets one-way option would be less than significant under the Reduced Heights Alternative.) Under cumulative conditions, traffic noise would be significant and unavoidable under both Folsom-Howard street network options, as with the Plan. Mitigation Measure M-NO-1a, Transportation Demand Management (TDM) for New Development Projects, would reduce traffic noise from new development by reducing traffic volumes, but not necessarily to a less-than-significant level, and cumulative traffic noise would result in a significant, unavoidable impact to existing noise-sensitive uses. As with the Plan, newly developed noise-generating uses would be subject to Mitigation Measure M-NO-1b, Siting of Noise-Generating Uses, which, along with compliance with the San Francisco Building Code, San Francisco Green Building Code, and Regulation of Noise from Places of Entertainment, would reduce impacts on sensitive land uses to a less-than-significant level. New noise-sensitive land uses would be required to comply with existing noise control standards and would not be significantly affected, as under the Plan.

Construction noise and construction vibration would be similar in nature to that under the Plan and would be significant, even with mitigation. **Mitigation Measures M-NO-2a**, **General Construction Noise Control Measures**, and **M-NO-2b**, **Noise and Vibration Control Measures during Pile Driving**, would be applicable to the Reduced Heights Alternative, as would **Mitigation Measures M-CP-3a**, **Protect Historical Resources from Adjacent Construction Activities**, and **M-CP-3b**, **Construction Monitoring Program for Historical Resources**. Similar to the Plan, construction noise impacts for the Reduced Heights Alternative would be expected to be significant, even with implementation of comparable mitigation if simultaneous construction activities were to occur proximate to the same sensitive receptor, while construction vibration effects would be less than significant with comparable mitigation. For the same reasons as for the Plan, cumulative construction noise impacts would be less than significant.

Air Quality and Greenhouse Gas Emissions

Emissions of criteria air pollutants, GHGs, and traffic-generated TACs would be incrementally reduced within the Plan Area, compared to those with the Plan, because the Reduced Heights Alternative would result in about 14 percent less residential growth and about 12 percent less employment growth in the Plan Area by 2040 than is assumed under the Plan. As with the Plan, VMT would increase by a lesser percentage (64 percent) than service population (135 percent) and so, at a plan level, the Reduced Heights Alternative would not result in significant criteria air pollutant impacts. However, as with the Plan, one or more subsequent individual development projects in the Plan Area could, if large enough, violate an air quality standard, contribute to an existing or projected air quality violation, and/or result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State ambient air quality standard. Mitigation would also apply to the Reduced Heights Alternative in the form of a project-specific Transportation Demand Management Program (Mitigation Measure M-NO-1a, Transportation Demand Management (TDM) for New Development Projects), which would reduce vehicle trips generated by subsequent development projects and concomitantly reduce emissions of criteria air pollutants and vehicular toxic air contaminants. Other mitigation measures related to operational air quality that are applicable to the Plan would also be applicable to the Reduced Heights Alternative, including Mitigation Measures M-AQ-3a, Education for Residential and Commercial Tenants Concerning Low-VOC Consumer Products; M-AQ-3b, Reduce Operational Emissions; and M-AQ-5a, Best Available Control Technology for Diesel Generators and Fire Pumps. However, in the absence of certainty that mitigated emissions from every subsequent development project would be below the applicable significance thresholds, this would be a significant, unavoidable impact of the Reduced Heights Alternative.

The proposed Plan's use districts and policy framework would be the same under the Reduced Heights Alternative and the Plan; only building height limits would vary. Moreover, as noted in Table IV.F-6, Consistency of the Plan with Transportation Control Measures of the 2010 Clean Air Plan, in Section IV.F, Air Quality, existing City programs are consistent with many of the 2010 Clean Air Plan's Transportation Control measures. As with the Plan, the Reduced Heights Alternative would support the Clean Air Plan's primary air quality, public health, and GHG reduction goals. Therefore, the Reduced Heights Alternative would not disrupt or hinder implementation of the Clean Air Plan.

Construction emissions of criteria pollutants from subsequent development projects would be incrementally less substantial under the Reduced Heights Alternative than the Plan; as with the Plan and the No Project Alternative, construction emissions would be significant and mitigation (Mitigation Measures M-AQ-4a, Construction Emissions Analysis, and M-AQ-4b, Construction Emissions Minimization Plan) would reduce the impact to a less-than-significant level.

As with the Plan, subsequent development under the Reduced Heights Alternative could generate particulates and TACs that would worsen air quality and adversely affect sensitive receptors. **Mitigation Measure M-NO-1a, Transportation Demand Management (TDM) for New Development Projects**, in Section IV.E, Noise and Vibration, would reduce TACs from vehicle emissions by reducing vehicle trips. **Mitigation Measures M-AQ-3b**, **Reduce Operational Emissions; M-AQ-5a**, **Best Available Control Technology for Diesel Generators and Fire Pumps; M-AQ-5b**, **Siting of Uses that Emit Particulate Matter (PM2.5)**, **Diesel Particulate Matter, or Other Toxic Air Contaminants**; and **M-AQ-5c**, **Update Air Pollution Exposure Zone for San Francisco Health Code Article 38**, would also reduce the severity of this impact, but not to a less-thansignificant level. As a result, this would be a significant, unavoidable impact of TACs emitted by traffic generated by the Reduced Heights Alternative, because the degree to which trips (and thereby trafficgenerated emissions) could be reduced by Mitigation Measure M-NO-1a cannot be reliably estimated at this time, vehicle emissions are regulated at the State and federal level and local jurisdictions are preempted from imposing stricter emissions standards for vehicles, and no other feasible mitigations for mobile source emissions are available. Construction-related emissions of particulates and TACs under the Reduced Heights Alternative would be significant, as with the Plan and the No Project Alternative, but would likewise be mitigated to a less-than-significant level with implementation of **Mitigation Measures M-AQ-6a**, **Construction Emissions Minimization Plan**, and **M-AQ-6b**, **Implement Clean Construction Requirements**.

It is noted that, to the extent that development that may be precluded under the Reduced Heights Alternative from taking place in the Plan Area were to occur elsewhere in the Bay Area, particularly in outlying, less dense locations that are less well-served by transit, employees in and residents of such developments could generate substantially greater impacts on air quality (specifically, regional criteria pollutants) and greenhouse gases than would be the case if a similar amount of office space, other non-residential space, or residential uses were developed in the Plan Area. The operational impacts of this type of development pattern would be relatively greater because lower office and residential densities reduces transit viability, making it likely that equivalent amounts of commercial and residential development would result in more vehicle trips in other locations. To the extent that the development occurs outside of PDAs identified in *Plan Bay Area*, regional emissions may increase incrementally relative to the Plan.

Impacts related to greenhouse gas emissions would be less than significant, as with the Plan and the No Project Alternative, given that subsequent development projects would be required to comply with the City's Greenhouse Gas Reduction Strategy.

Wind

The Reduced Heights Alternative would permit lower height limits on certain sites in the Plan Area than under the Plan, and consequently, could result in fewer taller buildings at those sites than if the Plan were implemented. As a result, the Reduced Heights Alternative could capture less upper-level winds, depending on building orientation, that when channeled down would have the potential to accelerate pedestrian-level winds. The Reduced Heights Alternative would also allow fewer towers south of the elevated Interstate 80 freeway. Compared to the Plan, wind speeds could be lower under the Reduced Heights Alternative on Harrison Street east of Fourth Street and on Townsend Street west of Fourth Street because, at both locations, the Reduced Heights Alternative would limit building heights to 130 feet, while the Plan would allow for towers up to 350 feet in height.

In two locations—at the northeast corner of Fourth and Townsend Streets, and at the southeast corner of Fifth and Brannan Streets—the Plan would allow towers at 25 percent greater heights than the Reduced Heights Alternative: 400 feet (compared to 320 feet under the Reduced Heights Alternative) at Fourth and Townsend Streets and 200 feet (compared to 160 feet under the Reduced Heights Alternative) at Fifth and Brannan Streets. These lower heights under the Reduced Heights Alternative would likely result in only marginally lower wind speeds because towers under either the Reduced Heights Alternative or the Plan would serve to accelerate pedestrian-level winds. The Reduced Heights Alternative would not necessarily avoid the significant impact of a wind hazard exceedance at the corner of Fourth and Brannan Streets, although this significant impact would be further reduced through implementation of **Mitigation Measure M-WI-1**, **Wind Hazard Criterion for the Plan Area**, which requires proposed buildings to be subject to additional wind analysis, including potential wind tunnel testing, and as needed, to adhere to wind hazard standards to reduce ground-level wind hazard exceedances. Nevertheless, as with the Plan, since it cannot be stated with certainty that each subsequent development project would be able to meet the wind hazard performance standard, this impact would remain significant and unavoidable.

The Reduced Heights Alternative would also have substantially lower height limits than the Plan at two locations-the block bounded by Bryant, Fifth, Brannan, and Sixth Streets, where the San Francisco Flower Mart is located (85 feet maximum versus 270 feet maximum), and a site at Fifth and Howard Streets, where the Tenderloin Neighborhood Development Corporation proposes an affordable housing project (85 feet maximum versus 300 feet maximum). Neither of those developments is assumed under the Reduced Heights Alternative. It is likely that at least two of the four hazard exceedances under the Plan around the block bounded by Bryant, Fifth, Brannan, and Sixth Streets (one hazard exceedance is existing) would not occur under the Reduced Heights Alternative, which would allow heights on this block no greater than 85 feet. This significant impact from the Plan would be reduced, and possibly eliminated, under the Reduced Heights Alternative; any potential residual effects could be avoided through implementation of Mitigation Measure M-WI-1. Likewise, under the Reduced Heights Alternative, any potentially significant wind impacts of the Plan near the corner of Fifth and Howard Streets would be avoided under the Reduced Heights Alternative, which would limit heights to a maximum of 85 feet at that location. In summary, the Reduced Heights Alternative could result in about three total wind hazard exceedances, compared to five total with the Plan. This significant impact could be reduced with implementation of Mitigation Measure M-WI-1, but it cannot be stated with certainty that wind impacts of subsequent development built to heights proposed under the Reduced Heights Alternative would be reduced to less than significant. This impact is therefore significant and unavoidable.

In conclusion, with implementation of Mitigation Measure M-WI-1 for the Reduced Heights Alternative, individual projects within the Plan Area would be subject to controls on pedestrian-level wind speeds that would reduce potential wind hazard exceedances. It cannot, however, be stated with certainty that subsequent development projects would not increase ground level winds in excess of the wind hazard criterion. Therefore, the Reduced Heights Alternative, like the Plan, would result in a significant unavoidable impact, even with mitigation.

Shadow

In general, the Reduced Heights Alternative would have similar shadow impacts on parks and open spaces near the Plan Area as would the Plan. The primary difference is that the Reduced Heights Alternative would avoid some of the shadow that would occur under the Plan on both Victoria Manalo Draves Park and South Park. The Reduced Heights Alternative would not increase height limits on the block bounded by Bryant, Fifth, Brannan, and Sixth Streets as would occur under the Plan. Therefore, development on this block would not result in new shadow on Victoria Manalo Draves Park. This would avoid the shadow impact of the Plan on this park; although the impact of the Plan was determined to be less than significant, this alternative would avoid any new shadow being cast on Victoria Manalo Draves Park by buildings on this block. As with the No Project Alternative, probable subsequent projects built to the existing 85-foot height limit on the east side of Sixth Street between Howard and Harrison Streets could potentially shade a portion of the outdoor area of the Gene Friend Recreation Center until about 9:00 a.m., when the Center opens. As with the Plan, this impact would be less than significant. Under the Reduced Heights Alternative, the height limit along the south side of Harrison Street between Second and Fourth Streets would be limited to 130 feet; therefore, shadow from these

buildings would not reach South Park, while the Plan could add a small amount of new shadow to South Park from this area.

Shading of Yerba Buena Gardens would be incrementally less under the Reduced Heights Alternative compared to that under the Plan, as the Reduced Heights Alternative proposes lower height limits on several parcels south and west of Yerba Buena Gardens. Minor amounts of new shadow would still likely reach Yerba Buena Gardens and the Alice Street Community Gardens, as under the Plan. Because the Reduced Heights Alternative proposes substantially lower building heights than the Plan near Second and Harrison Streets, this alternative would result in substantially less shade cast on the 303 Second Street POPOS than would the Plan. Shadow impacts to streets and sidewalks would be incrementally reduced under the Reduced Heights Alternative because of the lower allowable building heights. Because shadow impacts would be substantially less severe than with the Plan, shadow impacts from the Reduced Heights Alternative would be less than significant, as with the Plan.

Hydrology and Water Quality (Sea Level Rise and Combined Sewer System)

Like the Plan and the No Project Alternative, the Reduced Heights Alternative would not alter the northern shoreline of Mission Creek, which provides inundation pathways for flooding from future sea level rise. Nor would this alternative raise or lower the ground surface in a manner that would redirect flood flows. As with the Plan and the No Project Alternative, development under the Reduced Heights Alternative could be affected by future sea level rise adjacent to the Plan Area. However, consistent with the California Supreme Court's decision in *California Building Industry Association v. Bay Area Air Quality Management District*, this would not be a significant impact under CEQA, because development pursuant to the Reduced Heights Alternative would not significantly exacerbate this existing environmental hazard. As under existing conditions, projects in areas that are currently prone to flooding from the combined sewer system during wet weather would be reviewed by the SFPUC during the project approval process and may require additional actions such as incorporation of a pump station for sewage flows, raised elevation of entryways, special sidewalk construction, and deep gutters. These measures would reduce the potential for localized flooding. Therefore, impacts related to flooding would be less than significant, as under the Plan and the No Project Alternative.

The Reduced Heights Alternative would result in less development intensity than the Plan, and thus would lessen the increase in wastewater generation. Because the relationship between the increase in wastewater and the decrease in stormwater would remain similar to that under the Plan, the reduction in stormwater flows due to required stormwater reduction measures is expected to offset estimated increases in wastewater flows during wet weather such that there would not be an increase in wet weather combined sewer discharges, and impacts related to an increase in combined sewer discharges under the Reduced Heights Alternative would be less than significant, as under the Plan.

Issues Analyzed in the Initial Study

Impacts Related to the Intensity of Development

Given that the Reduced Heights Alternative would have fewer households and a smaller residential population than the Plan, it is expected that the demand for, and associated impacts to, recreation and public space would be incrementally less substantial than under the Plan. Similarly, the demand for, and associated impacts on, utilities and service systems and public services would also be less than under the Plan; and all of these impacts would be less than significant.

Impacts Related to Site-Specific Conditions

Impacts related to site-specific conditions, such as those related to biology, geology and soils, hydrology and water quality, and hazardous materials would be similar to those of the Plan because it can be assumed that many, if not most, of the same sites would be redeveloped in the future. It is not anticipated that foundation systems (and, therefore, ground-disturbing activities) would be substantially different than with development pursuant to the Plan because the Reduced Heights Alternative would construct high-rise buildings on the same sites, and such buildings may require deeper foundations and/or different types of foundations than shorter structures that could be allowed under existing zoning. Site-specific geology and soils impacts would be less than significant, with the same mitigation measures, where applicable, as with the Plan. **Mitigation Measures M-BI-1, Pre-construction Bat Surveys**, and **M-HZ-3, Hazardous Building Materials Abatement**, would be applicable, as with the Plan and the No Project Alternative would be less than significant with mitigation, as with the Plan. Impacts to geology and hydrology and water quality would be less than significant, as with the Plan and the No Project Alternative.

As with the Plan, this alternative would have less-than-significant impacts related to mineral and energy resources and no impacts on agricultural or forest resources, since none of these resources are present within the Plan Area.

Project Objectives

The Reduced Heights Alternative would result in 14 percent fewer additional households, and 12 percent fewer additional jobs than the Plan, and consequently, would meet Objective 1, "increase the capacity for new jobs and housing" to a lesser extent than the Plan. Overall, this Alternative would meet most of the eight project objectives, as would the Plan.

VI.D Alternative 3: Modified TODCO Plan

VI.D.1 Description

The TODCO Group, a South of Market affordable housing and community development non-profit organization, released its "Central SOMA Community Plan" (TODCO Plan) in May 2013, in response to the Planning Department's April 2013 release of what was then known as the Central Corridor Plan (now the

Central SoMa Plan) and the Notice of Preparation of this EIR.⁴²⁴ TODCO revised its plan in October 2016 after the draft Central SoMa Plan was revised in August 2016.

For purposes of this EIR, a modification to the TODCO Plan's proposed height limits on major development sites was made (as explained under Proposed Modified TODCO Plan Height Limits, below). Hereafter, this modified version of TODCO's Plan is referred to as the Modified TODCO Plan, and is described and analyzed below. Please refer to Section VI.H, Alternatives Considered but Rejected, for a discussion of why the unmodified TODCO Plan was rejected as an alternative in this EIR.

The Modified TODCO Plan is based on an assumption that office development in San Francisco would proceed over the next 20 years at an average rate of about 750,000 square feet per year, or a total of 15 million square feet.⁴²⁵ That is about 25 percent more office space per year than the approximately 610,000 square feet of office use that has been approved annually, on average, in the 29 years since the City's Office Development Annual Limit was created in 1985 as part of the Downtown Plan.⁴²⁶ Of the total of 15 million square feet, the Modified TODCO Plan proposes that up to about five million square feet be accommodated in the southern portion of the Plan Area (from the north side of Harrison Street south), with the remainder foreseen to be developed in the Financial District, including the Transit Center District east of the Plan Area and the existing C-3 use districts northeast of the Plan Area; Mission Bay and the Central Waterfront, including Pier 70 and the Seawall Lot 337/Pier 48 site where large mixed-use developments are proposed; and, to a lesser extent, in the Civic Center/Mid-Market area. Thus, assuming these other neighborhoods could accommodate this level of growth, the Modified TODCO Plan envisions that the Plan Area would be anticipated to accommodate less growth in office employment, but citywide office job growth would likely be comparable to city and regional forecasts.

The Modified TODCO Plan proposes this division of office space as a means of taking advantage of the underconstruction Central Subway. The Central Subway will extend from Chinatown through the Union Square area, the Plan Area, and Mission Bay, and will pass within two blocks of the Pier 70 development site before continuing south through the Bayview and into Visitacion Valley. The Modified TODCO Plan also seeks to avoid concentrating as much office development in the Plan Area as is proposed under the Plan, and rather, spreading out the total future office development over the next 20 years along the Central Subway corridor, resulting in approximately two-thirds (i.e., 10 million square feet) of total future office development occurring

⁴²⁴ TODCO Group, *Central SOMA Community Plan: EIR Draft for Community Discussion*, May 2013. Available at: http://www.todcocentralsomacommunityplan.org/our-plan/, accessed on August 30, 2016.

⁴²⁵ The 15,000,000 square feet of office space would accommodate about 75,000 jobs, based on the Planning Department's assumptions for future office development in the Plan Area (200 square feet per employee, primarily based on newer technology company offices), although only about 54,350 jobs using 276 square feet per employee from the Department's Guidelines for Transportation Analysis. Growth of 75,000 office jobs would be generally consistent with Association of Bay Area Governments and Planning Department 20-year forecasts for citywide office employment growth (2010–2030 and 2015–2035), which is the Modified TODCO Plan's estimated planning horizon.

⁴²⁶ It is noted that, for the first 12 years of the annual limit, only a total of about 1.6 million square feet of office space was approved in San Francisco. Approvals were initially constrained by the annual limit itself, including the voter-approved halving of the annually allowable 950,000 square feet until projects approved prior to November 1986 had received building permits. Development was further limited by the recession of the early 1990s, and the City went four years (1992–93 through 1996–97) without approval of a single new office building. In the 17 years beginning with the 1997–98 annual limit period, some 16 million square feet of office space has been approved (941,000 square feet per year), with annual totals ranging from zero (twice) to 3.6 million square feet in 2012–13.

outside the Plan Area. This is intended as a means of minimizing the loss of older, relatively smaller commercial buildings that provide relatively more affordable office-type space for new small businesses, including technology startups, which cannot afford newer space that provides more amenities. Such buildings, according to the Modified TODCO Plan, "are vital to SOMA's character and the city's economy."⁴²⁷ To preserve such older, mid-size buildings, the Modified TODCO Plan proposes a prohibition on lot mergers of parcels smaller than 0.5 acre (21,780 square feet) unless no existing building with a floor area ratio greater than 1.5 would be demolished. Such a restriction would be more stringent than the Plan's proposed Implementation Measure 7.6.1.1, which by way of *Planning Code* amendment would not permit the consolidation of most lots within the Plan Area containing buildings with historic or neighborhood-character buildings where the frontage that could be merged is under 200 feet in length.

It is assumed the Modified TODCO Plan would include the same street network changes that are proposed under the Plan.

Proposed Modified TODCO Plan Boundary

The Modified TODCO Plan proposed boundary is presented in **Figure VI-8**, **Modified TODCO Plan Proposed Boundary**. As shown in Figure VI-8, the Modified TODCO Plan encompasses the majority of the Plan Area but (1) excludes the SoMa Neighborhood Commercial Transit (NCT) parcels within the Plan Area fronting along the east side of Sixth Street between Stevenson Street and just north of Folsom Street and (2) includes certain additional parcels outside the Plan Area south of Mission Street, east of Sixth Street, and west of Third Street, including, but not limited to, the 5M development site, Moscone Center, and Yerba Buena Gardens.

Proposed Modified TODCO Plan Use Districts

Proposed use districts in the Modified TODCO Plan Area are depicted in **Figure VI-9**, **Modified TODCO Plan Use Districts**.

Proposed Modified TODCO Plan Use Districts within the Central SoMa Plan Area

The Modified TODCO Plan proposes a number of use district changes within its plan boundary. Use districts within the Central SoMa Plan Area portion of the Modified TODCO Plan would be largely the same north of Harrison Street as proposed under the Plan. The primary difference would be that the Modified TODCO Plan would extend the Western SoMa Plan's Folsom Street Neighborhood Commercial Transit (F-NCT) district two blocks east to Fourth Street, rather than zoning parcels along Folsom Street as Mixed-Use, General (MUG) or Mixed-Use, Office (MUO). The F-NCT district allows office use at the first or second story of a building, but not both, and prohibits office and most non-residential uses (except schools) above the second story: the intent is a typical mixed-use neighborhood with residential uses above ground-floor retail and other commercial uses. The Modified TODCO Plan would also slightly vary the distribution of MUO and MUG use districts between Folsom and Harrison Streets and Fourth and Sixth Streets.

⁴²⁷ TODCO Plan, p. 35 (see footnote 7).



SOURCE: TODCO; San Francisco Planning Department

Case No. 2011.1356E: Central SoMa Plan Figure VI-8 Modified TODCO Plan Proposed Boundary



SOURCE: TODCO; San Francisco Planning Department

Between Harrison and Bryant Streets, south of where the elevated I-80 freeway passes, the Modified TODCO Plan would designate the blocks between Second and Fourth Streets as Western SoMa MUO (WSoMa MUO),⁴²⁸ rather than the Central SoMa Plan's MUO allowing office use but prohibiting residential units on parcels abutting the freeway (similar to the Land Use Variant, addressed immediately following the Modified TODCO Plan). Between Fourth and Sixth Streets, both the Modified TODCO Plan and the Central SoMa Plan's Service-Arts-Light Industrial (SALI) zoning.⁴²⁹

In contrast to the Central SoMa Plan, between Bryant and Townsend Streets, the Modified TODCO Plan would retain nearly one-half of the existing SALI use district between Fourth and Sixth Streets, and retain all of the existing Residential Enclave (RED) use district parcels between Fourth and Fifth Streets. The Modified TODCO Plan would convert the remainder of the existing SALI use district between Bryant and Townsend Streets to MUO (allowing office use and residential), with the exception of one parcel along the west side of Fifth Street between Brannan and Bluxome Streets that would be converted to WSoMa MUO, but which would permit student housing. Between Second and Fourth Streets, the Modified TODCO Plan would, like the Plan, designate most of the area MUO (retaining the South Park District), but would also create a new Fourth Street Neighborhood Commercial (4-NCT) use district, similar to the F-NCT but allowing office and other commercial uses above the second story while requiring that second-story commercial uses be neighborhood-serving.

Proposed Modified TODCO Plan Use Districts Outside of the Central SoMa Plan Area

The Modified TODCO Plan also proposes a number of use district changes within the Modified TODCO Plan Area, but outside the Central SoMa Plan Area. North of the Central SoMa Plan Area between Fourth and Sixth Streets, the Modified TODCO Plan proposes to convert a number of parcels currently designated C-3-S to MUG. The Modified TODCO Plan also would convert the existing C-3-S portions of the two blocks of Yerba Buena Gardens and Moscone Center, bounded by Mission, Third, Folsom and Fourth Streets as a new Yerba Buena Gardens Special Use District (SUD).

South of the boundary of the Central SoMa Plan Area (and the Modified TODCO Plan Area), the Modified TODCO Plan would designate a parcel located at the southeast corner of Fourth and Townsend Streets (the site of the Caltrain station) as WSoMa-MUO⁴³⁰.

Other Proposed Modified TODCO Plan Use District Requirements (Within and Outside Central SoMa Plan Area)

In addition, the Modified TODCO Plan also proposes a number of PDR/Arts protections. Specifically, the Modified TODCO Plan proposes to incorporate all the provisions of Proposition X (passed by the voters in November 2016), which will require, among other provisions, Conditional Use authorization in the Central

⁴²⁸ The Modified TODCO Plan Use District map (see Figure VI-1) refers to the Western SoMa Mixed-Use Office district as "WSoMa MUO," while the Plan refers to this district as WS-MUO; however, both represent the same use district.

⁴²⁹ The Modified TODCO Plan Use District map refers to the Western SoMa SALI use district as "SALI"" while the Plan refers to this district as "WS-SALI," however, both represent the same use district.

⁴³⁰ The Caltrain station is the subject of a separate Planning Department planning process, the Fourth and King Streets Railyards Study.

SoMa Plan Area (among other plan areas) for conversion of at least 5,000 square feet of a PDR use, or at least 2,500 square feet of an Arts Activity use; and in addition, in SALI, SLI, MUO and MUG districts would require replacement of the space proposed for conversion on-site as part of the new project. The Modified TODCO Plan would also extend its requirements for MUG districts to the current and future WS-MUG and MUO districts within the Central SoMa Plan Area, as well as a number of other areas within SoMa.

Proposed Modified TODCO Plan Height Limits

Within the Modified TODCO Plan Area, including that encompassed by the Central SoMa Plan Area, the Modified TODCO Plan proposes no height limit increases for any new development above the existing height limits currently in effect, except as specified for certain major development sites within the Central SoMa Plan Area. These major development sites are shown in **Figure VI-10**, **Modified TODCO Plan Major Development Sites**. At those major development sites, the Modified TODCO Plan would increase height limits to the same heights limits proposed at those sites under the Central SoMa Plan.

Other Components of the Proposed Modified TODCO Plan

Like the proposed Plan, the Modified TODCO Plan proposes a new park in the area of Fifth and Bryant Streets. While the Plan proposes evaluating park use of a mid-block property owned by the San Francisco Public Utilities Commission (SFPUC), the Modified TODCO Plan proposes a park that would occupy both sides of Fifth Street between Bryant and Brannan Streets, providing about 1.4 acres of parkland on either side of Fifth Street (2.8 acres total)—twice the size of the SFPUC parcel.

Additional components of the Modified TODCO Plan include a proposal to modify the existing SoMa Youth and Family Zone by incorporating into the zone provisions regarding senior citizens, expanding the area subject to the zone's inclusionary housing provisions, and increasing the emphasis on the provision of affordable housing (the Plan does not propose any changes to the existing SoMa Youth and Family Zone); as well as a specific proposal for affordable senior housing atop the Central Subway Moscone Center station being built at the northwest corner of Fourth and Folsom Streets.

Development Assumptions

In terms of the projected level of commercial activity, this analysis assumes the Modified TODCO Plan's proposed five million square feet of office development in the southern portion of the Plan Area and adds the Planning Department assumptions for additional projected growth. This would result in a total of about 9.3 million square feet of growth in in office space, compared to about 10.4 million square feet with the Plan. Accordingly, overall development assumptions for this alternative include the total addition of approximately 12,700 households and 22,500 residents (about 12 percent less than with the Plan) and approximately 56,700 jobs (11 percent less than with the Plan). Total floor area developed would be about 11 percent less than with implementation of the proposed Plan.⁴³¹

⁴³¹ The TODCO Plan did not provide assumed growth projections. Growth projections for the TODCO Plan are based on the available TODCO Plan inputs, and using a number of assumptions for the proposal as a whole. See Table VI-1 for additional detail on projected growth values.



SOURCE: TODCO; San Francisco Planning Department

- Case No. 2011.1356E: Central SoMa Plan

Figure VI-10 Modified TODCO Plan Major Development Sites

VI.D.2 Alternative 3–Modified TODCO Plan: Impacts

Land Use and Land Use Planning

Like the Plan, this alternative would not physically divide an existing community, as it would not introduce physical barriers. With the street network changes, in addition to the growth anticipated under this alternative, the Modified TODCO Alternative would result in significant and unavoidable increases in traffic noise, and would conflict with plans adopted for the purpose of avoiding or mitigating an environmental effect, should the Howard and Folsom Streets two-way street network change option be implemented. This alternative, like the Plan, would result in a significant unavoidable conflict with *General Plan* policy regarding traffic noise.

Aesthetics

Under the Modified TODCO Plan, permitted building height limits in the majority of the Plan Area would not change from existing height limits. Exceptions would be at the major development sites identified in the Modified TODCO Plan, where tower height limits would be the same as those permitted by the Plan. Overall, aesthetic changes under the Modified TODCO Plan would be substantially less noticeable than those of the Plan.

The Modified TODCO Plan would not include the Plan's proposed open space improvements, and as a result, this alternative would not alter the physical or operational characteristics of open space areas proposed under the Plan. However, the Modified TODCO Plan would include an approximately 2.8-acre open space. Consequently, the Modified TODCO Plan would result in similar aesthetic impacts (albeit less than significant) associated with construction or operation of the Plan's open space improvements.

Therefore, as with the Plan, the Modified TODCO Plan would have less-than-significant aesthetic impacts.

Cultural and Paleontological Resources

Historic Architectural Resources

The Modified TODCO Plan would result in less development within the Plan Area than the Plan. Similar to the Plan, this alternative would generally prohibit lot mergers of smaller parcels in a deliberate attempt to retain a number of older low- and mid-rise structures. Therefore, this alternative would have comparable impacts to those of the Plan on historical resources. As with the Plan, subsequent development projects under this alternative could result in demolition or substantial alteration of individually identified historic architectural resources or contributing resources to a historic district or conservation district located in the Plan Area. In particular, as with the proposed Plan, the increased allowable height limits on parcels in the southwestern portion of the Modified TODCO Plan area, specifically the California Register-eligible San Francisco Flower Mart District and Bluxome-Townsend Warehouse District sites, could result in additional pressure to develop sites where historical resources are located. However, under the Modified TODCO Plan, identified historic resources would not be included in Articles 10 and 11 of the *Planning Code*, which provide added protection to these resources. The Modified TODCO Plan Alternative would also result in significant

and unavoidable impacts, with mitigation, on historic architectural resources, both with respect to the Modified TODCO Plan and cumulatively.

Mitigation Measures M-CP-1a, Avoidance or Minimization of Effects on Identified Historical Resources; M-CP-1b, Documentation of Historical Resource(s); M-CP-1c, Oral Histories; M-CP-1d, Interpretive Program; and M-CP-1e, Video Recordation, would apply to this alternative with respect to direct effects on historical resources, while Mitigation Measures M-CP-3a, Protect Historical Resources from Adjacent Construction Activities, and M-CP-3b, Construction Monitoring Program for Historical Resources, would apply, with respect to indirect, construction-related effects.

The Modified TODCO Plan would not include construction the Plan's proposed open space improvements, and consequently, would avoid the Plan's construction-related impacts to architectural historical resources (albeit less than significant) associated with those improvements.

Archeological Resources, Human Remains, and TCRs

The Modified TODCO Plan would result in comparable impacts to those of the Plan on prehistoric and/or historic-period archeological resources, human remains, and/or tribal cultural resources. As with the Plan, this impact would be reduced to a less-than-significant level through implementation of **Mitigation Measures M-CP-4a**, **Project-Specific Preliminary Archeological Assessment**, and **M-CP-4b**, **Procedures for Accidental Discovery of Archeological Resources**. Cumulative impacts would likewise be less than significant with mitigation, as with the Plan.

Paleontological Resources

As noted above, the Modified TODCO Plan would result in less development than would the Plan, as well as none of the Plan's open space improvements, but would include a 2.8-acre open space. Impacts to paleontological resources would be less than significant, both for this alternative and cumulatively, as would be the case with the Plan, given the low sensitivity of Plan Area soils for such resources.

Transportation and Circulation

VMT

Under the Modified TODCO Plan, household growth in the Plan Area would be about 12 percent less and employment growth would be about 11 percent less by 2040 than is assumed under the Plan. As with the Plan, the average daily VMT per capita for the Modified TODCO Plan would be substantially lower than the Bay Area regional average for the residential, office, and retail land uses, and the Modified TODCO Plan would meet the *Plan Bay Area* goal of reducing residential VMT per capita by 10 percent compared to year 2005 levels. Thus, impacts related to VMT under the Modified TODCO Plan would be less than significant, as would be the case with the Plan.

Traffic Hazards

Under the Modified TODCO Plan, development projects would not introduce unusual design features. As with the Plan, increases in vehicle, pedestrian and bicycle travel associated with new development would result in the potential for increased vehicle-pedestrian and vehicle-bicycle conflicts, and increased average vehicle delays at intersections, but these increases would not be considered new or a substantial worsening of a traffic hazard. Thus, the impact related to traffic hazards under the Modified TODCO Plan would be less than significant, as would be the case with the Plan.

Transit

Transit ridership would increase about seven percent less under the Modified TODCO Plan than with implementation of the Plan. The relative reduction in ridership would avoid the Plan's significant impact on Muni capacity utilization on some, but not all, screenlines and corridors. In addition, as with the Plan, the Modified TODCO Plan would result in significant impacts on regional (i.e., BART) transit capacity utilization under existing plus Plan and 2040 cumulative conditions. Therefore, impacts related to local and regional transit capacity utilization under the Modified TODCO Plan would be significant and unavoidable with mitigation, as with the Plan, and **Mitigation Measure M-TR-3a**, **Transit Enhancements**, would be applicable to the Modified TODCO Plan. The Modified TODCO Plan would include the same transit improvements proposed with the Plan, including dedicated transit lanes and bus bulbs at select locations, as part of the street network improvements.

Also as with the Plan, development in the Plan Area under the Modified TODCO Plan would increase traffic congestion, causing delays for Muni buses and regional transit carriers that operate on city streets (Golden Gate Transit and SamTrans), a significant impact under existing plus Plan and 2040 cumulative conditions. Implementation of Mitigation Measures M-TR-3a, Transit Enhancements; M-TR-3b, Boarding Improvements, M-TR-3c; Signalization and Intersection Restriping at Townsend/Fifth Streets; and M-TR-3d, Implement Tow-away Transit-only Lanes on Fifth Street could reduce peak-period transit delays on Muni, Golden Gate Transit, and SamTrans routes. However, the feasibility of these measures is uncertain, both because it is not known whether or how much additional funding could be made available and because physical improvements would be the responsibility of the SFMTA. Thus, these measures are not certain to adequately mitigate the impacts to less-than-significant levels, and transit delay impacts would be significant and unavoidable.

Pedestrians and Bicycle Impacts

In terms of pedestrian and bicycle operations, the Modified TODCO Plan is assumed to result in about seven percent less travel by these modes, compared to the Plan; and would implement the same proposed street network changes, including new bicycle lanes and cycle tracks, widened sidewalks, and new mid-block crosswalks. With incrementally less development in the Plan Area by 2040, the Modified TODCO Plan, would not avoid the Plan's significant impacts with respect to pedestrian crowding in crosswalks under existing plus Plan and 2040 cumulative conditions. Pedestrian impacts under the existing plus Plan and 2040 cumulative conditions, therefore, would be significant and unavoidable with mitigation under the Modified TODCO Plan, as with the Plan, and Mitigation Measure M-TR-4, Upgrade Central SoMa Area Crosswalks would be applicable to the Modified TODCO Plan. However, these measures would not mitigate impacts to less-than-

significant levels. Under 2040 cumulative conditions, the Modified TODCO Plan would contribute considerably to significant and unavoidable cumulative pedestrian impacts at a number of sidewalk and corner locations, because improvements beyond those proposed as part of the Plan's street network changes would not likely be feasible without redesign of roadways that could remove bicycle, transit-only, or mixed-flow travel lanes. Therefore, pedestrian impacts under existing Modified TODCO Plan and cumulative conditions would be significant and unavoidable with mitigation.

Growth in bicycle travel would also be incrementally less substantial under the Modified TODCO Plan, compared to conditions with the Plan, and the facilities provided would be similar to the Plan. It is anticipated that bicycle-related impacts of the Modified TODCO Plan would be less than significant, as under the Plan.

Loading

With incrementally less development than under the Plan, the Modified TODCO Plan would result in less growth in demand for off-street freight loading spaces, on-street commercial loading spaces, and passenger loading/ unloading zones. However, with the same street network changes as the Plan, about 60 existing onstreet freight loading zones would be removed under the Modified TODCO Plan, as would a number of onstreet passenger loading zones, to implement the proposed street network changes, and other commercial loading spaces and passenger loading/unloading zones would be unavailable during peak periods. This could result in double parking could adversely affect local vehicular, transit, and bicycle circulation, particularly on streets with transit-only and bicycle lanes (e.g., Third, Mission, Howard, and Folsom Streets), and would result in a significant loading impact even with mitigation. Because the Modified TODCO Plan would include the same street network improvements, and because it would include only incrementally less development than the Plan, the Modified TODCO Plan's impact on loading would be significant and unavoidable with mitigation, and Mitigation Measures M-TR-6a, Driveway and Loading Operations Plan, and M-TR-6b, Accommodation of On-street Commercial Loading Spaces and Passenger Loading/Unloading Zones, would apply to the Modified TODCO Plan.

Parking

The Modified TODCO Plan would increase parking demand by about seven percent less than the Plan. Because parking-related impacts from the Plan would be less than significant, the Modified TODCO Plan would also have a less-than-significant impact with respect to parking.

Emergency Vehicle Access

Under the Modified TODCO Plan, development projects in the Plan Area would not introduce unusual design features or change the Plan Area street network as to hinder or preclude emergency vehicle access, but would increase traffic volumes on Plan Area streets, and implementation the proposed street network changes under the Modified TODCO Plan would reduce the number of mixed-flow travel lanes on some streets. While emergency vehicles would be able to travel within transit-only lanes, and fire and rescue vehicles would be able to mount the raised separation between vehicle travel lanes and any protected cycle track or transit-only lanes, it is likely that increased traffic congestion combined with reduced roadway capacity dedicated to motor vehicles would occasionally impede emergency vehicle access in the Plan Area during peak periods of traffic with the Modified TODCO Plan, a significant impact. While the Modified TODCO Plan would result in

incrementally less development than with the Plan, impacts related to emergency access would be significant due to increased congestion and the street network changes, as with the Plan. Implementation of Mitigation Measure M-TR-8, Emergency Vehicle Access Consultation, would ensure that the final design of each street network project would adequately meet emergency provider needs considering the location of the proposed street network project, the number of mixed-flow travel lanes available to general traffic, and raised buffers between the mixed-flow travel lanes and transit-only lanes and/or cycle tracks, and would not result in secondary transportation-related impacts. With implementation of this mitigation measure impacts related to emergency vehicle access would be less than significant with mitigation, as under the proposed Plan.

Construction Impacts

Construction activities associated with the Modified TODCO Plan would be similar to those described for the Plan, though somewhat less intensive due to less development and fewer tall buildings that would be possible to construct under this alternative than under the Plan. Though the Modified TODCO Plan would result in less development intensity than the Plan, development under the Modified TODCO Plan could still result in several construction projects (development projects and street improvement projects) occurring simultaneously in close proximity to each other within the Plan Area, and result in significant construction-related transportation impacts, including potential disruption of traffic, transit, pedestrian, and bicycle circulation. **Mitigation Measure M-C-TR-9, Construction Management Plan and Construction Coordination**, would still apply, and construction-related transportation impacts would remain significant and unavoidable with mitigation, as for the Plan. As with the Plan, development under the Modified TODCO Plan, in combination with construction of other projects outside of the Plan Area would not result in significant cumulative construction-related transportation impacts.

Noise and Vibration

Traffic-generated noise would be essentially the same under the Modified TODCO Plan as under the Plan, and would be significant and unavoidable, as with the Plan, because traffic generated under the Modified TODCO Plan, while marginally lower in volume on at least some streets, would result in a noise increase in excess of 3 dBA on one or more street segments. Under cumulative conditions, traffic noise would also increase more than 3 dBA, and similarly would be significant and unavoidable, as with the Plan. **Mitigation Measure M-NO-1a, Transportation Demand Management (TDM) for New Development Projects**, would reduce traffic noise from new development by reducing traffic volumes, but not necessarily to a less-than-significant level, and cumulative traffic noise would result in a significant, unavoidable impact to existing noise-sensitive uses.

As with the Plan, newly developed noise-generating uses would be subject to **Mitigation Measure M-NO-1b**, **Siting of Noise-Generating Uses**, which, along with compliance with the *San Francisco Building Code*, *San Francisco Green Building Code*, and Regulation of Noise from Places of Entertainment, would reduce impacts to sensitive land uses to a less-than-significant level. New noise-sensitive land uses would be required to comply with existing noise control standards and would not be significantly affected, as under the Plan.

Construction noise and construction vibration would be similar in nature to that under the Plan and would be significant. **Mitigation Measures M-NO-2a**, **General Construction Noise Control Measures**, and **M-NO-2b**, **Noise and Vibration Control Measures during Pile Driving**, would be applicable to the Modified TODCO

Plan, as would **Mitigation Measures M-CP-3a**, **Protect Historical Resources from Adjacent Construction Activities**, and **M-CP-3b**, **Construction Monitoring Program for Historical Resources**. However, if multiple projects were to be under construction simultaneously in close proximity to the same sensitive receptors, the combined effect of these construction noise impacts may result in noise levels for which the available, feasible measures identified in Mitigation Measure M-NO-2a would be insufficient to reduce the construction-related noise impacts to a less-than-significant level. Therefore, potential construction-related noise impacts on adjacent or nearby noise-sensitive receptors would be significant and unavoidable. For the same reasons as for the Plan, cumulative construction noise impacts would be less than significant.

Air Quality and Greenhouse Gas Emissions

The relative reduction in vehicle trip generation would also reduce emissions of criteria air pollutants, GHGs, and traffic-generated TACs, because the Modified TODCO Plan is assumed to result in about 12 percent less residential growth and 11 percent less employment growth in the Plan Area by 2040 than is assumed under the Plan. As with the Plan, VMT under the Modified TODCO Plan would increase by a lesser percentage (66 percent) than service population (138 percent) and so, at a plan level, the Modified TODCO Plan would not result in significant criteria air pollutant impacts. Although the Modified TODCO Plan does not include the same policies as the proposed Plan, this alternative sets forth a framework that would likely ensure compliance with the 2010 Clean Air Plan, in that this alternative would provide for growth in office-based employment consistent with patterns envisioned by Plan Bay Area that are expected to reduce per capita VMT and GHG emissions, and is located in proximity to transit. Thus, the Modified TODCO Plan is presumed to accommodate anticipated employment growth of Plan Bay Area, which was developed by ABAG and MTC, who are also the agencies responsible for the growth assumptions in the 2010 Clean Air Plan. Under this alternative, use districts would differ somewhat from those under the proposed Plan. However, existing City programs are consistent with many of the 2010 Clean Air Plan's Transportation Control measures. As with the proposed Plan, this alternative would support the Clean Air Plan's primary air quality, public health, and GHG reduction goals because it would accommodate envisioned growth within a PDA and proximate to substantial transit options. Therefore, the Modified TODCO Plan would not disrupt or hinder implementation of the Clean Air Plan.

However, as with the Plan, the potential would remain that one or more subsequent individual development projects in the Plan Area could, if large enough, violate an air quality standard, contribute to an existing or projected air quality violation, and/or result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State ambient air quality standard. As with the proposed Plan, mitigation measures would apply in the form of a project-specific Transportation Demand Management Program (Mitigation Measure M-NO-1a, Transportation Demand Management for New Development Projects), which would reduce vehicle trips generated by subsequent development projects and concomitantly reduce emissions of criteria air pollutants and vehicular toxic air contaminants. Other mitigation measures related to operational air quality that are applicable to the Plan would also be applicable to this alternative, including Mitigation Measures M-AQ-3a, Education for Residential and Commercial Tenants Concerning Low-VOC Consumer Products; M-AQ-3b, Reduce Operational Emissions; and M-AQ-5a, Best Available Control Technology for Diesel Generators and Fire Pumps. However, in the absence of certainty that mitigated emissions from every subsequent development

project would be below the applicable significance thresholds, this would be a significant and unavoidable impact of the Modified TODCO Plan.

Since the Modified TODCO Plan would include the Plan's street network changes, the Modified TODCO Plan would reduce the amount of mixed-flow travel lanes and therefore would not have the potential to result in increased vehicle congestion from reduced mixed-flow travel lanes, which was found to result in a significant and unavoidable impact with respect to the street network changes under the Plan. The overall impact of the Modified TODCO Plan on operational air criteria air pollutants would be significant and unavoidable.

Construction emissions of criteria pollutants from subsequent development projects would be incrementally less than under the Plan because there would be less overall development intensity; however, as with the Plan, construction emissions would be significant and mitigation (Mitigation Measures M-AQ-4a, Construction Emissions Analysis, and M-AQ-4b, Construction Emissions Minimization Plan) would reduce the impact to a less-than-significant level.

As with the Plan, subsequent development under this alternative could generate particulates and TACs that would worsen air quality and adversely affect sensitive receptors. Mitigation Measure M-NO-1a, Transportation Demand Management (TDM) for New Development Projects, in Section IV.E, Noise and Vibration, would reduce TACs from vehicle emissions by reducing vehicle trips. Mitigation Measures M-AQ-3b, Reduce Operational Emissions; M-AQ-5a, Best Available Control Technology for Diesel Generators and Fire Pumps; M-AQ-5b, Siting of Uses that Emit Particulate Matter (PM2.5), Diesel Particulate Matter, or Other Toxic Air Contaminants; and M-AQ-5c, Update Air Pollution Exposure Zone for San Francisco Health Code Article 38, would reduce the severity of this impact, but not to a less-thansignificant level. As a result, this would be a significant and unavoidable impact of TACs emitted by traffic generated by the Modified TODCO Plan, because the degree to which trips (and thereby traffic-generated emissions) could be reduced by Mitigation Measure M-NO-1a cannot be reliably estimated at this time, vehicle emissions are regulated at the State and federal level and local jurisdictions are preempted from imposing stricter emissions standards for vehicles, and no other feasible mitigations for mobile source emissions are available. Construction-related emissions of particulates and TACs under the Modified TODCO Plan would be significant, as with the Plan, but would likewise be mitigated to a less-than-significant level with implementation of Mitigation Measures M-AQ-6a, Construction Emissions Minimization Plan, and M-AQ-6b, Implement Clean Construction Requirements. The Modified TODCO Plan specifically would not place new residents directly adjacent to the elevated I-80 freeway, avoiding or substantially lessening the air quality impacts on new residents.

It is noted that, to the extent that development that may be precluded under the Modified TODCO Plan from taking place in the Plan Area were to occur elsewhere in the Bay Area, particularly in outlying, less dense locations that are less well-served by transit, employees in and residents of such developments could generate substantially greater impacts on air quality (specifically, regional criteria pollutants) and greenhouse gases than would be the case if a similar amount of office space, other non-residential space, or residential uses were developed in the Plan Area. The operational impacts of this type of development pattern would be relatively greater because lower office and residential densities reduces transit viability, making it likely that equivalent amounts of commercial and residential development would result in more vehicle trips in other locations. To the extent that the development occurs outside of PDAs identified in *Plan Bay Area*, that development could

hinder meeting *Plan Bay Area*'s regional GHG per capita targets. This could be a significant, albeit indirect and somewhat speculative, impact of the Modified TODCO Plan.

Impacts related to greenhouse gas emissions would be less than significant, as with the Plan, given that subsequent development projects would be required to comply with the City's Greenhouse Gas Reduction Strategy.

Wind

The Modified TODCO Plan proposes no height limit increases in the Plan Area for any new development above the existing height limits currently in effect, except as specified for certain major development sites, which would be same as under the Plan. Consequently, potential wind effects in the majority of the Plan Area under the Modified TODCO Plan (with the exception of the major development sites) would be expected to be less than that which would occur under Plan. At those locations in the Plan Area where height limits would not increase, the Modified TODCO Plan would be unlikely to result in substantial wind effects, and thus wind impacts would be less than significant.

On the other hand, potential wind effects at the major development sites in the Plan Area would be expected to be similar to that of the Plan, and associated wind hazard impacts could be similarly significant. As with the Plan, implementation of **Mitigation Measure M-WI-1**, **Wind Hazard Criterion for the Plan Area**, would require the major development project to be subject to additional wind analysis, including potential wind tunnel testing, and as needed, to adhere to wind hazard standards to reduce ground-level wind hazard exceedances. Nevertheless, as with the Plan, it cannot be stated with certainty that each major development project would be able to meet the wind hazard performance standard, and this impact would remain significant and unavoidable, as with the Plan.

Shadow

Under the Modified TODCO Plan, permitted building height limits in the majority of the Plan Area would not change from existing height limits. Exceptions would be at the major development sites identified in the Modified TODCO Plan, where tower height limits would be the same as those permitted by the Plan. Therefore, for the most part, the shadow effects of this alternative would be the same as, or less than, those of the Plan, and similarly less than significant.

Hydrology and Water Quality (Sea Level Rise and Combined Sewer System)

Like the Plan, the Modified TODCO Plan would not alter the northern shoreline of Mission Creek, which provides inundation pathways for flooding from future sea level rise. Nor would this alternative raise or lower the ground surface in a manner that would redirect flood flows. As with the Plan, development under the Modified TODCO Plan could be affected by future sea level rise in the Plan Area. However, consistent with the California Supreme Court's decision in *California Building Industry Association v. Bay Area Air Quality Management District*, this would not be a significant effect under CEQA, because development pursuant to the Modified TODCO Plan would not significantly exacerbate this existing environmental hazard. As under existing conditions, projects in areas that are currently prone to flooding from the combined sewer system

during wet weather would be reviewed by the SFPUC during the project approval process and may require additional actions such as incorporation of a pump station for sewage flows, raised elevation of entryways, special sidewalk construction, and deep gutters. These measures would reduce the potential for localized flooding. Therefore, impacts related to flooding would be less than significant, as under the Plan and the No Project Alternative.

The Modified TODCO Plan would result in less development than the Plan, and thus would lessen the increase in wastewater generation. If certain sites were not redeveloped at all, this alternative would also result in less of a decrease in the amount of stormwater runoff to the combined sewer system. However, because the relationship between the increase in wastewater and the decrease in stormwater would remain similar to that under the Plan, the reduction in stormwater flows due to required stormwater reduction measures is expected to offset estimated increases in wastewater flows during wet weather such that there would not be an increase in wet weather combined sewer discharges, and impacts related to an increase in combined sewer discharges under the Modified TODCO Plan would be less than significant, as under the Plan and the No Project Alternative.

Issues Analyzed in the Initial Study

Impacts Related to the Intensity of Development

Given that the Modified TODCO Plan would have fewer households and thus lower overall residential population than the Plan, it is expected the demand for, and associated impacts related to, recreation and public space would also be incrementally less substantial than under the Plan. Similarly, given that the Modified TODCO Plan would have fewer households and less overall development intensity than the Plan, the demand for, and associated impacts to, utilities and service systems, and public services, would also be less than under the Plan; and all of these impacts would be less than significant.

Impacts Related to Site-Specific Conditions

Impacts related to site-specific conditions, such as those related to biology, geology and soils, hydrology and water quality, and hazardous materials would be similar to or less severe than those of the proposed Plan because many of the same sites could be subject to future development. Therefore, impacts related to geology and soils would be the same as under the Plan. As with the Reduced Heights Alternative, it is not anticipated that foundation systems (and, therefore, ground-disturbing activities) would be substantially different than with development pursuant to the Plan because the Modified TODCO Plan would construct high-rise buildings on most of the same sites. **Mitigation Measures M-BI-1, Pre-construction Bat Surveys**, and **M-HZ-3, Hazardous Building Materials Abatement** would be applicable, as with the Plan and the Reduced Heights Alternative, and, in the case of biological resources and hazardous materials, impacts of the Modified TODCO Plan would be less than significant with mitigation, as with the Plan and the Reduced Heights Alternative. Impacts on geology and hydrology and water quality would be less than significant, as with the Plan, the Reduced Heights Alternative and the No Project Alternative.

As with the proposed Plan, the Modified TODCO Plan would have less-than-significant impacts related to mineral and energy resources and no impacts on agricultural or forest resources, because these resources do not exist within the Plan Area.

Project Objectives

TODCO indicates its plan is premised on ensuring the capacity for development of about five million square feet of new office development in the Central Corridor over the next 20 years; and seeks, among other objectives, to increase PDR/Arts protections beyond that proposed by the Plan; maintain commercial development sites in locations where residential development is not appropriate; maximize the on-site public benefits of the major developments; avoid negative shadow effects on public open spaces; avoid incentivizing demolition of smaller existing buildings; and concentrate neighborhood street life and retail activity on Folsom and Fourth Streets.

Because the Modified TODCO Plan would develop approximately 11 percent less new office space than with the Plan, this alternative would partially achieve the Plan's goals of "increas[ing] the capacity for jobs and housing" (Objective 1) and "facilitat[ing] an economically diversified and lively jobs center (Objective 3), but not as well as the Plan. Since the Plan's street network changes would be implemented, this alternative would meet Objective 4 of the Plan, "provide safe and convenient transportation that prioritizes walking, bicycling, and transit." Additionally, the Modified TODCO Plan would appear to "offer an abundance of parks and recreational opportunities" (Objective 5) and to "create an environmentally sustainable and resilient neighborhood" (Objective 6). This alternative would appear to conform to Objective 8, to "ensure that new buildings enhance the character of the neighborhood and the city," as it would result in an "overall development pattern … complementary to the skyline" (Plan Objective 8.2) and would "reinforce the character of Central SoMa as a mid-rise district with tangible 'urban rooms'" (Plan Objective 8.3) and use urban form to emphasize important nodes, such as the Central Subway. Accordingly, the Modified TODCO Plan would meet most of the objectives of the proposed Plan.

VI.E Alternative 4: Land Use Variant

VI.E.1 Description

The Land Use Variant is a variant of the Plan that would not permit residential uses in the WS-SALI and WS-MUO use districts in the area roughly bounded by Bryant, Townsend, Fourth and Sixth Streets. Although this area would be zoned MUO as proposed under the Plan, the prohibition on new housing adopted as part of the Western SoMa Plan would remain in effect. The intention of the Land Use Variant is to minimize potential land use conflicts in this approximately four-block area between new housing and existing and future commercial and entertainment uses. The Land Use Variant would be overlaid upon the Plan, and this alternative would allow for development at the same heights and same locations as under the Plan; only the above-described land use changes would be different within the area covered by the Land Use Variant. All other aspects of the Land Use Variant would be the same as under the Plan, including the street network changes proposed under the Plan.

For purposes of a conservative and comparative analysis, this alternative assumes that the Land Use Variant would be adopted in conjunction the Plan, which as shown in Table VI-1 would result in approximately 10 percent fewer new households and about four percent more new jobs than would be the case under the Plan. This alternative would allow 1.8 million square feet less residential development, and 0.59 million square

feet more commercial development than the Plan, for a net decrease of 1.2 million square feet development compared to the Plan.

VI.E.2 Alternative 4—Land Use Variant: Impacts

Land Use and Land Use Planning

Land use impacts would be similar to those of the Plan under the Land Use Variant. Like the Plan, this alternative would not physically divide an existing community, as it would not introduce physical barriers, and would result in a less-than-significant impact. This alternative would prohibit new residential construction in the area bounded by Bryant, Townsend, Fourth and Sixth Streets. Consequently, the Land Use Variant would result in incrementally lesser potential for land use conflicts inasmuch as the variant would preclude residential uses where nighttime entertainment would be encouraged. Given the compliance with the *San Francisco Building Code, San Francisco Green Building Code,* and Regulation of Noise from Places of Entertainment, these impacts would be less than significant, as under the Plan. However, with the Howard and Folsom Streets two-way option for street network improvements, this alternative would have the same significant unavoidable conflict with the *General Plan* policy regarding traffic noise.

Aesthetics

Aesthetic impacts would be less than significant, as with the Plan, and impacts are assumed to be very similar to those of the Plan because, while the Land Use Variant would allow only non-residential uses in the approximately four block area between Bryant, Townsend, Fourth, and Sixth Streets, building height and massing would be anticipated to be comparable to those under the Plan. As with the Plan, development under the Land Use Variant would not adversely affect the visual character of the Plan Area or scenic resources, nor would it substantially alter the public views of the Plan Area, result in substantially increased light and glare, or make a considerable contribution to aesthetic conditions in the Plan Area, and these, impacts, too, would be less than significant.

Cultural and Paleontological Resources

Historic Architectural Resources

Because it would involve essentially the same development sites as the Plan, this alternative, like the Plan, would result in a significant and unavoidable impact, with mitigation, on historic architectural resources resulting from the demolition or substantial alteration of historical resources. Cumulative impacts on historical resources would likewise be significant and unavoidable with mitigation, as would be the case for the Plan. **Mitigation Measures M-CP-1a, Avoidance or Minimization of Effects on Identified Historical Resources; M-CP-1b, Documentation of Historical Resource(s)**; **M-CP-1c, Oral Histories; M-CP-1d, Interpretive Program**; and **M-CP-1e, Video Recordation**, would apply with respect to direct effects on historical resources, while **Mitigation Measures M-CP-3a**, **Protect Historical Resources from Adjacent Construction Activities**, and **M-CP-3b**, **Construction Monitoring Program for Historical Resources**, would apply with respect to indirect, construction-related effects.

Archeological Resources, Human Remains, and TCRs

The Land Use Variant would result in comparable impacts to those of the Plan on prehistoric and/or historicperiod archeological resources, human remains, and/or tribal cultural resources. As with the Plan, this impact would be reduced to a less-than-significant level through implementation of **Mitigation Measures M-CP-4a**, **Project-Specific Preliminary Archeological Assessment**, and **M-CP-4b**, **Procedures for Accidental Discovery of Archeological Resources**. Cumulative impacts would likewise be less than significant with mitigation, as with the Plan.

Paleontological Resources

Impacts to paleontological resources would be less than significant, both for this alternative and cumulatively, as would be the case with the Plan, given the low sensitivity of Plan Area soils for such resources.

Transportation and Circulation

VMT

Under the Land Use Variant, residential growth in the Plan Area would be 10 percent less and employment growth would be about four percent more by 2040 than is assumed under the Plan. As with the Plan, the average daily VMT per capita for the Land Use Variant would be substantially lower than the Bay Area regional average for the residential, office, and retail land uses, and the Land Use Variant would meet the *Plan Bay Area* goal of reducing residential VMT per capita by 10 percent compared to year 2005 levels. In addition, the street network changes under the Land Use Variant would not substantially induce automobile travel, as with the Plan. Thus, impacts related to VMT under the Land Use Variant would be less than significant, as would be the case with the Plan.

Traffic Hazards

Under the Land Use Variant, development projects and the proposed street network changes would not introduce unusual design features. As with the Plan, increases in vehicle, pedestrian and bicycle travel associated with new development would result in the potential for increased vehicle-pedestrian and vehicle-bicycle conflicts, and increased average vehicle delays at intersections, but these increases would not be considered new or a substantial worsening of a traffic hazard. Thus, the impact related to traffic hazards under the Land Use Variant would be less than significant, as would be the case with the Plan.

Transit

Transit ridership would increase by nearly the same amount as with implementation of the Plan, given that changes in anticipated population growth resulting from Plan implementation would be similar. Therefore, this alternative would not avoid any of the significant transit impacts identified under the Plan, and impacts related to Muni and regional transit capacity utilization under the existing plus Land Use Variant and 2040 cumulative conditions would be significant and unavoidable with mitigation, as with the Plan. **Mitigation Measure M-TR-3a, Transit Enhancements**, would be applicable to the Land Use Variant. The Land Use

Variant would include the same transit improvements proposed with the Plan, including dedicated transit lanes and bus bulbs at select locations, as part of the street network improvements.

Also as with the Plan, development in the Plan Area under the Land Use Variant would increase traffic congestion, causing delays for Muni buses and regional transit carriers that operate on city streets (Golden Gate Transit and SamTrans), a significant impact under existing plus Plan and 2040 cumulative conditions. Implementation of Mitigation Measures M-TR-3a, Transit Enhancements; M-TR-3b, Boarding Improvements, M-TR-3c, Signalization and Intersection Restriping at Townsend/Fifth Streets; and M-TR-3d, Implement Tow-away Transit-only Lanes on Fifth Street, could reduce peak-period transit delays on Muni, Golden Gate Transit, and SamTrans routes; however, the feasibility of these measures is uncertain, both because it is not known whether or how much additional funding could be made available and because physical improvements would be the responsibility of the SFMTA. Thus, these measures are not certain to adequately mitigate the impacts to less-than-significant levels. Therefore, impacts to Muni, Golden Gate Transit on gate significant and unavoidable.

Pedestrian and Bicycle Impacts

In terms of pedestrian and bicycle operations, the Land Use Variant would result in about the same amount of travel by these modes as would the Plan, and would implement the same proposed street network changes, including new bicycle lanes and cycle tracks, widened sidewalks, and new mid-block crosswalks. Thus, the Land Use Variant would not avoid the Plan's significant impacts with respect to pedestrian crowding in crosswalks under existing plus Plan and 2040 cumulative conditions. Pedestrian impacts would be significant and unavoidable, as with the Plan. **Mitigation Measure M-TR-4**, **Upgrade Central SoMa Crosswalks**, would be applicable to the Land Use Variant.

Bicycle travel and facilities would also be similar under the Land Use Variant to that with the Plan. Inasmuch as the Plan would result in less-than-significant impacts with respect to bicycle conditions, bicycle-related impacts of the Land Use Variant would also be less than significant.

Loading

Under the Land Use Variant, loading impacts would be the same as for the Plan. The Land Use Variant would result in similar demand for off-street freight loading spaces, on-street commercial loading spaces, and passenger loading/unloading zones as for the Plan. However, with the same street network changes as the Plan, removal of on-street commercial loading spaces and passenger loading/unloading zones could result in double parking that could adversely affect local vehicular, transit, and bicycle circulation, particularly on streets with transit-only and bicycle lanes. Because the Land Use Variant would include the same street network improvements, its impact on loading would be significant and unavoidable with mitigation, as with the Plan. **Mitigation Measures M-TR-6a**, **Driveway and Loading Operations Plan**, and **M-TR-6b**, **Accommodation of On-street Commercial Loading Spaces and Passenger Loading/Unloading Zones**, would apply to the Land Use Variant.

Parking

The Land Use Variant would increase parking demand similar to the Plan. Because parking impacts from the Plan would be less than significant, the Land Use Variant would also have a less-than-significant impact with respect to parking.

Emergency Vehicle Access

Under the Land Use Variant Alternative, emergency vehicle access impacts would be the same as for the Plan. The Land Use Variant would result in essentially the same amount of development as with the Plan, and impacts to emergency vehicle access would be significant due to increased congestion and the street network changes, which could impede emergency vehicles during periods of peak traffic volumes, as with the Plan. **Mitigation Measure M-TR-8, Emergency Vehicle Access Consultation**, would apply to the Land Use Variant and therefore impacts related to emergency vehicle access would be less than significant with mitigation, as under the Plan.

Construction Impacts

Construction activities associated with the Land Use Variant Alternative would be similar to those that described for the Plan. Development under the Land Use Variant Alternative under existing plus Plan conditions could still result in several construction projects (development projects and street improvement projects) occurring simultaneously in close proximity to each other within the Plan Area, and result in significant construction-related transportation impacts, including potential disruption of traffic, transit, pedestrian, and bicycle circulation. **Mitigation Measure M-TR-9, Construction Management Plan and Construction Coordination**, would apply to the Land Use Variant Alternative, and construction-related transportation impacts under existing plus Land Use Variant Alternative would remain significant and unavoidable with mitigation, as with the Plan. As with the Plan, development under the Land Use Variant Alternative, in combination with construction of other projects outside of the Plan Area would not result in significant cumulative construction-related transportation impacts.

Noise and Vibration

Traffic-generated noise would be similar under the Land Use Variant to that under the Plan, and would likewise be significant and unavoidable, because traffic would result in a noise increase in excess of 3 dBA on one or more street segments along Howard Street under the Howard and Folsom Streets two-way option. (As with the Plan, traffic noise with the Howard and Folsom Streets one-way option would be less than significant under the Land Use Variant.) Under cumulative conditions, traffic noise would be significant and unavoidable under both Folsom/Howard options. **Mitigation Measure M-NO-1a, Transportation Demand Management (TDM) for New Development Projects,** would reduce traffic noise from new development by reducing traffic volumes, but not necessarily to a less-than-significant level, and cumulative traffic noise would result in a significant and unavoidable impact to existing noise-sensitive uses.

As with the Plan, newly developed noise-generating uses would be subject to **Mitigation Measure M-NO-1b**, **Siting of Noise-Generating Uses**, which, along with compliance with the *San Francisco Building Code*, *San Francisco Green Building Code*, and Regulation of Noise from Places of Entertainment, would reduce impacts on

sensitive land uses to a less-than-significant level. New noise-sensitive land uses would be required to comply with existing noise control standards and would not be significantly affected. Moreover, the Land Use Variant would prohibit housing in the area roughly bounded by Bryant, Townsend, Fourth, and Sixth Streets, within the Plan's proposed Central SoMa SUD Entertainment Sub-area, which would limit the potential for noise conflicts between entertainment and residential uses. Thus, under the variant, there would be less potential for noise from nighttime entertainment, especially new Places of Entertainment, to disturb residents and for residents to seek to restrict the operations of Places of Entertainment. It is noted that the Land Use Variant would not completely eliminate such conflicts because this area contains a fair number of existing residential buildings, notably on Bluxome Street, on Townsend Street at Fifth and at Sixth Streets, and on Brannan Street between Fourth and Fifth Streets, although most are relatively new and thus likely to include better noise insulation than older residential development. As noted, new entertainment uses would be required to be designed to minimize noise impacts on any nearby existing residential uses in accordance with Mitigation Measure M-NO-1b, Siting of Noise-Generating Uses, and Police Code provisions that allow the Entertainment Commission to adopt noise-related permit conditions on Places of Entertainment. Combined implementation of the City code provisions and Mitigation Measure M-NO-1b would reduce the potential for noise conflicts between new entertainment and existing residential uses proposed as part of the Land Use Variant to a lessthan significant level.

Construction noise and construction vibration would be similar in nature to that under the Plan and would be significant. **Mitigation Measures M-NO-2a**, **General Construction Noise Control Measures**, and **M-NO-2b**, **Noise and Vibration Control Measures during Pile Driving**, would be applicable to the Land Use Variant, as would **Mitigation Measures M-CP-3a**, **Protect Historical Resources from Adjacent Construction Activities**, and **M-CP-3b**, **Construction Monitoring Program for Historical Resources**. However, if multiple projects were to be under construction simultaneously in close proximity to the same sensitive receptors, the combined effect of these construction noise impacts may result in noise levels for which the available, feasible measures identified in Mitigation Measure M-NO-2a would be insufficient to reduce the construction-related noise impacts to a less-than-significant level. Therefore, potential construction-related noise impacts on adjacent or nearby noise-sensitive receptors would be significant and unavoidable. For the same reasons as for the Plan, cumulative construction noise impacts would be less than significant.

Air Quality and Greenhouse Gas Emissions

Emissions of criteria air pollutants, GHGs, and traffic-generated TACs would be slightly less than those of the Plan because the Land Use Variant would result in less development. As with the Plan, VMT would increase by a lesser percentage (78 percent) than service population (155 percent) and so, at a plan level, the Land Use Variant would not result in significant criteria air pollutant impacts. However, as with the Plan, one or more subsequent individual development projects in the Plan Area could, if large enough, violate an air quality standard, contribute to an existing or projected air quality violation, and/or result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State ambient air quality standard. Mitigation would also apply to the Land Use Variant in the form of a project-specific Transportation Demand Management Program (**Mitigation Measure M-NO-1a, Transportation Demand Management for New Development Projects**), which would reduce vehicle trips generated by subsequent development projects and concomitantly reduce emissions of criteria air pollutants and vehicular toxic air contaminants.⁴³² Other mitigation measures related to operational air quality that are applicable to the Plan would also be applicable to the Land Use Variant, including **Mitigation Measures M-AQ-3a**, **Education for Residential and Commercial Tenants Concerning Low-VOC Consumer Products**; **M-AQ-3b**, **Reduce Operational Emissions**; and **M-AQ-5a**, **Best Available Control Technology for Diesel Generators and Fire Pumps**. However, in the absence of certainty that mitigated emissions from every subsequent development project would be below the applicable significance thresholds, this would be a significant and unavoidable impact of the Land Use Variant.

The proposed Plan's use districts and policy framework would be similar to those under the Land Use Variant as under the Plan, except that there would be less residential development, which would be precluded from some of the Plan Area. Moreover, as noted in Table IV.F-6, Consistency of the Plan with Transportation Control Measures of the 2010 Clean Air Plan, in Section IV.F, Air Quality, existing City programs are consistent with many of the 2010 Clean Air Plan's Transportation Control measures. As with the Plan, the Land Use Variant would support the *Clean Air Plan*'s primary air quality, public health, and GHG reduction goals. Therefore, the Land Use Variant would not disrupt or hinder implementation of the *Clean Air Plan*.

Construction emissions of criteria pollutants from subsequent development projects would be somewhat less under the Land Use Variant, compared to that under the Plan. As with the Plan, construction emissions would still be significant and mitigation (**Mitigation Measures M-AQ-4a, Construction Emissions Analysis**, and **M-AQ-4b**, **Construction Emissions Minimization Plan**) would reduce the impact to a less-than-significant level.

As with the Plan, subsequent development under the Land Use Variant could generate particulates and TACs that would worsen air quality and adversely affect sensitive receptors. **Mitigation Measure M-NO-1a**, **Transportation Demand Management (TDM) for New Development Projects**, in Section IV.E, Noise and Vibration, would reduce TACs from vehicle emissions by reducing vehicle trips. **Mitigation Measures M-AQ-3b**, **Reduce Operational Emissions**; **M-AQ-5a**, **Best Available Control Technology for Diesel Generators and Fire Pumps**; **M-AQ-5b**, **Siting of Uses that Emit Particulate Matter (PM2.5)**, **Diesel Particulate Matter, or Other Toxic Air Contaminants**; and **M-AQ-5c**, **Update Air Pollution Exposure Zone for** *San Francisco Health Code* **Article 38**, would reduce the severity of this impact, but not to a less-than-significant level. As a result, this would be a significant and unavoidable impact of TACs generated by the Land Use Variant, because the degree to which trips (and thereby traffic-generated emissions) could be mitigated cannot be reliably estimated, Additionally, vehicle emissions are regulated at the State and federal level and local jurisdictions are preempted from imposing stricter emissions standards for vehicles, and no other feasible mitigations for mobile source emissions are available.

Construction-related emissions of particulates and TACs under the Land Use Variant would be significant, as with the Plan, but would likewise be mitigated to a less-than-significant level with implementation of **Mitigation Measure M-AQ-6a**, **Construction Emissions Minimization Plan**, and **M-AQ-6b**, **Implement Clean Construction Requirements**.

⁴³² As noted in Chapter II, Project Description, the City is anticipated to adopt an ordinance by fall 2016 that would mandate TDM Programs in many new development projects.

The Land Use Variant would result in 1.2 million square feet less development compared to the Plan. Nevertheless, as with the proposed Plan, this alternative would support the VMT reduction goals of *Plan Bay Area* because it would accommodate envisioned growth within a PDA and proximate to substantial transit options.

Impacts related to greenhouse gas emissions would be less than significant, as with the Plan, given that subsequent development projects would be required to comply with the City's Greenhouse Gas Reduction Strategy.

Wind

Wind impacts would be essentially the same under the Land Use Variant as under the Plan. As stated in the description of this alternative, that the Land Use Variant would be overlaid upon the Plan, this alternative would allow for development at the same heights and same locations as under the Plan; only the land uses would be different within the approximately four-block area covered by the Land Use Variant. In this area, no new residential uses would be allowed. Similar to the Plan, implementation of **Mitigation Measure M-WI-1**, **Wind Hazard Criterion for the Plan Area**, for the Land Use Variant would serve to reduce the wind hazard impacts associated with subsequent development projects; however, this impact would remain significant and unavoidable, as under the Plan.

Shadow

Shadow impacts would be the same under the Land Use Variant as under the Plan. As stated in the description of this alternative, that the Land Use Variant would be overlaid upon the Plan, this alternative would allow for development at the same heights and same locations as under the Plan; only the land uses would be different within the approximately four-block area covered by the Land Use Variant. As with the Plan, shadow impacts would be less than significant.

Hydrology and Water Quality (Sea Level Rise and Combined Sewer System)

Like the Plan, the Land Use Variant would not alter the northern shoreline of Mission Creek, which provides inundation pathways for flooding from future sea level rise; nor would it raise or lower the ground surface in a manner that would redirect flood flows. As with the Plan, development under the Land Use Variant could be affected by future sea level rise adjacent to the Plan Area. However, consistent with the California Supreme Court's decision in *California Building Industry Association v. Bay Area Air Quality Management District*, this would not be a significant effect under CEQA, because development pursuant to the Land Use Variant would not significantly exacerbate this existing environmental hazard. As under existing conditions, projects in areas that are currently prone to flooding from the combined sewer system during wet weather would be reviewed by the SFPUC during the project approval process and may require additional actions such as incorporation of a pump station for sewage flows, raised elevation of entryways, special sidewalk construction, and deep gutters. These measures would reduce the potential for localized flooding. Therefore, impacts of the Land Use Variant related to flooding would be less than significant, as under the Plan.

The Land Use Variant would result in a similar amount of development as the Plan; both wastewater generation and stormwater flows would be similar. As with the Plan, the reduction in stormwater flows due to required stormwater reduction measures is expected to offset estimated increases in wastewater flows during wet weather such that there would not be an increase in wet weather combined sewer discharges, and impacts related to an increase in combined sewer discharges under the Land Use Variant would be less than significant.

Issues Analyzed in the Initial Study

Impacts Related to the Intensity of Development

Given that the Land Use Variant would have about 10 percent fewer households and similarly smaller residential population than the Plan, it is expected the demand for, and associated impacts related to, recreation and public space would be incrementally less substantial than the Plan. Similarly, given that the Land Use Variant would have incrementally fewer households and slightly higher commercial use intensity than the Plan, the overall demand for, and associated impacts to, utilities and service systems, and public services would be similar to those of the Plan; all these impacts would be less than significant, as with the Plan.

Impacts Related to Site-Specific Conditions

Impacts related to site-specific conditions, such as those related to biology, geology and soils, hydrology and water quality, and hazardous materials would be similar to those of the Plan because it can be assumed that many, if not most, of the same sites would be affected by subsequent future development projects. It is not anticipated that foundation systems (and, therefore, ground-disturbing activities) would be substantially different than with development pursuant to Plan, because the Land Use Variant would allow the construction of high-rise buildings on the same sites. Therefore, impacts related to geology and soils would be the same as under the Plan. **Mitigation Measures M-BI-1**, **Pre-construction Bat Surveys**, and **M-HZ-3**, **Hazardous Building Materials Abatement** would be applicable, as with the Plan.

As with the Plan, this alternative would have less-than-significant impacts related to mineral and energy resources and no impacts on agricultural or forest resources, because these resources are not present within the Plan Area.

Project Objectives

The Land Use Variant would meet most of the eight project objectives because it would allow for development on the same sites and at the same height and density as the Plan. The Land Use Variant would perform incrementally better than the Plan with respect to Plan Objective 3.6, "Recognize the importance of nightlife uses in creating a complete neighborhood," in that it would provide a more-supportive framework for such uses by reducing land use conflicts with residential uses. However, by not permitting as much housing in the Plan Area as under the Plan, the Land Use Variant would not meet the Plan objective to "increase the capacity for jobs and housing (Objective 1) to the same extent as the Plan.

VI.F Alternative 5: Land Use Plan Only Alternative

VI.F.1 Description

The Land Use Plan Only Alternative assumes the same policies and *Planning Code* and *General Plan* amendments would be implemented as with the Plan, except that this alternative would exclude implementation of the Plan's proposed street network changes. As such, development assumptions for this alternative would be the same as those for the Plan, including the addition, by 2040 in the Plan Area, of approximately 14,400 households, 25,500 residents and approximately 63,600 jobs. Total floor area developed by 2040 in the Plan Area under this alternative would also be the same as the Plan, at 31.7 million square feet.

VI.F.2 Alternative 5–Land Use Plan Only Alternative: Impacts

Because the Land Use Only Alternative would not include the Plan's proposed street network changes, this alternative would result in no impacts related to construction and operation of this project component. This analysis considers impacts of the Land Use Plan Only Alternative as it relates to the removal of street network changes on land use, subsurface cultural resources (including archeological resources, tribal cultural resources, and human remains), transportation, noise, air quality, and greenhouse gas emissions.

Because there would be no change in Plan Area development intensity or locations of development under the Land Use Plan Only Alternative compared to the Plan, impacts of this alternative as it relates to development density would be the same as those of the Plan with respect to land use, aesthetics, cultural resources, wind, shadow, hydrology and water quality (including flooding due to sea level rise and combined sewer system capacity), population and housing, recreation, utilities and service systems, public services, biology, geology, and hazards and hazardous materials. Nevertheless, relevant effects and mitigation measures for key topics, including transportation, air quality and noise are summarized below.

Land Use and Land Use Planning

The Land Use Plan Only Alternative would not include the Plan's proposed street network changes, and as a result, this alternative would not involve any construction within, or alter the physical or operational characteristics of, public rights-of-way associated with the street network changes proposed under the Plan. Since it does not include the street network changes proposed for the Plan, this alternative would avoid the significant and unavoidable conflict with General Plan policy regarding traffic noise (Impact LU-2).

Cultural and Paleontological Resources

Historic Architectural Resources

The Land Use Plan Only Alternative would involve the same development sites as the Plan. As such, the Land Use Plan Only Alternative, like the Plan, would result in a significant and unavoidable impact, with mitigation, on historic architectural resources resulting from the demolition or substantial alteration of historical resources. Cumulative impacts on historical resources would likewise be significant and

unavoidable with mitigation, as would be the case for the Plan. Mitigation Measures M-CP-1a, Avoidance or Minimization of Effects on Identified Historical Resources; M-CP-1b, Documentation of Historical Resource(s); M-CP-1c, Oral Histories; M-CP-1d, Interpretive Program; and M-CP-1e, Video Recordation, would apply with respect to direct effects on historical resources, while Mitigation Measures M-CP-3a, Protect Historical Resources from Adjacent Construction Activities, and M-CP-3b, Construction Monitoring Program for Historical Resources, would apply with respect to indirect, construction-related effects.

The Land Use Plan Only Alternative would not include the Plan's proposed street network changes, and consequently, would avoid the Plan's construction-related impacts to architectural historical resources (albeit less than significant) associated with construction of those improvements.

Archeological Resources, Human Remains, and TCRs

The Land Use Plan Only Alternative would result in marginally lesser impacts than those of the Plan on prehistoric and/or historic-period archeological resources, human remains, and/or tribal cultural resources, because this alternative would avoid excavation associated with street improvements such as transit boarding islands, new traffic signals and associated electrical conduits, sidewalk bulb-outs widened sidewalks, and cycle tracks. However, impacts to such resources would still occur as a result of subsequent development projects. As with the Plan, this impact would be reduced to a less-than-significant level through implementation of **Mitigation Measures M-CP-4a**, **Project-Specific Preliminary Archeological Assessment**, and **M-CP-4b**, **Procedures for Accidental Discovery of Archeological Resources**. Cumulative impacts would likewise be less than significant with mitigation, as with the Plan, and would be somewhat less substantial for the reasons noted above. The Land Use Only Plan Alternative would also avoid the less-than-significant impacts to human remains and tribal cultural resources associated with construction of those improvements.

Paleontological Resources

Impacts to paleontological resources would be less than significant, both for the Land Use Plan Only Alternative and cumulatively, as would be the case with the Plan, given the low sensitivity of Plan Area soils for such resources.

Transportation and Circulation

VMT

Under the Land Use Plan Only Alternative, residential and employment growth in the Plan Area would be the same as under the Plan. Thus, as with the Plan, the Land Use Plan Only Alternative would meet the *Plan Bay Area* goal of reducing residential VMT per capita by 10 percent compared to year 2005 levels. The Land Use Plan Only Alternative would not include any transportation features (e.g., street network changes) that would substantially induce automobile travel, but would lack the street network changes proposed under the Plan that would likely further reduce VMT by promoting alternative transportation modes. Thus, impacts related to VMT under the Land Use Plan Only Alternative would be less than significant, as would be the case with the Plan.

Traffic Hazards

Under the Land Use Plan Only Alternative, development projects would not introduce unusual design features. As with the Plan, increases in vehicle, pedestrian and bicycle travel associated with new development would result in the potential for increased vehicle-pedestrian and vehicle-bicycle conflicts, and increased average vehicle delays at intersections, but these increases would not be considered new or a substantial worsening of a traffic hazard. The Land Use Plan Only Alternative would lack the street network changes proposed under the Plan that would help further reduce the number of conflicts. Thus, the impact related to traffic hazards under the Land Use Plan Only Alternative would be less than significant, as would be the case with the Plan.

Transit

Transit ridership under the Land Use Plan Only Alternative would increase by the same amount as with implementation of the Plan, as the SF-CHAMP model analysis of travel demand associated with the Plan did not identify appreciable changes to the number or mode (i.e., auto, transit, walk, bicycle, and other modes) of person trips between conditions without and with the proposed street network changes. Therefore, the Land Use Plan Only Alternative would not avoid the significant Muni and regional transit capacity utilization impacts identified under the Plan for existing plus Plan and 2040 cumulative conditions, and impacts related to transit capacity utilization under this alternative would be significant and unavoidable with mitigation, as with the Plan. **Mitigation Measure M-TR-3a, Transit Enhancements**, would be applicable to the Land Use Plan Only Alternative.

The Land Use Plan Only Alternative would not include the Plan's proposed transit improvements, including dedicated transit lanes and bus bulbs at select locations. As with the Plan, development in the Plan Area under the Land Use Plan Only Alternative would increase traffic congestion, causing delays for Muni buses and regional transit carriers that operate on city streets (i.e., Golden Gate Transit and SamTrans), a significant impact. Specifically with respect to Muni service, the Land Use Plan Only Alternative would avoid the significant travel time increases on the 10 Townsend (Howard/Folsom two-way option only), 14 Mission, and 14R Mission Rapid that would occur under the Plan, but would introduce new significant travel time increases on the 8 Bayshore, 27 Bryant and 47 Van Ness, compared to what would occur under the Plan. While the Plan would cause significant transit delay impacts during the PM peak hour only, the Land Use Plan Only would cause significant transit delay impacts during both the AM peak and PM peak hours, though fewer lines would be significantly impacted overall.

Implementation of Mitigation Measures M-TR-3a, Transit Enhancements; M-TR-3b, Boarding Improvements; M-TR-3c, Signalization and Intersection Restriping at Townsend/Fifth Streets; and M-ALT-TR-1, Upgrade Transit-Only Lanes on Third Street, could reduce peak-period transit delays on Muni, Golden Gate Transit, and SamTrans routes; however, the feasibility of these measures is uncertain, both because it is not known whether or how much additional funding could be made available, and because physical improvements would be the responsibility of the SFMTA, and thus these measures are not certain to adequately mitigate the impacts to less–than-significant levels. Mitigation Measure M-TR-3d, Implement Tow-away Lanes on Fifth Street, would not be applicable because the Land Use Plan Only Alternative would

avoid significant travel time increases on the 10 Townsend route. Therefore, impacts to Muni and regional transit operations under this alternative would be significant and unavoidable.

Mitigation Measure

M-ALT-TR-1: Upgrade Transit-Only Lanes on Third Street. The SFMTA shall implement protected transit-only lanes on Third Street between Townsend and Market Streets to reduce the impacts of vehicle congestion on transit travel times. The protected transit-only lane would reduce inbound travel times on the 8AX/8BX Bayshore Expresses, 30 Stockton, and the 45 Union-Stockton routes.

Pedestrian and Bicycle Impacts

In terms of pedestrian and bicycle operations, the Land Use Plan Only Alternative would result in the same amount of travel by these modes in 2040 as under the Plan. The Land Use Plan Only Alternative would not implement the Plan's proposed street network changes, including widened sidewalks, new bicycle facilities, and new mid-block crosswalks. The Land Use Plan Only Alternative would result in a greater number of significant impacts at a number of crosswalk locations under existing plus Plan and under 2040 cumulative conditions. Implementation of **Mitigation Measure M-TR-4**, **Upgrade Central SoMa Area Crosswalks**, and **Mitigation Measure M-ALT-TR-2**, **Upgrade Additional Central SoMa Area Crosswalks**, could reduce pedestrian crosswalk impacts at some locations to less than significant. However, because the feasibility of the crosswalk widening beyond the current width is uncertain due to roadway or other physical constraints, the pedestrian impact at the crosswalks with development under the Land Use Plan Only Alternative would remain significant and unavoidable with mitigation. Under 2040 cumulative conditions, the Land Use Plan Only Alternative would remain significant and unavoidable with mitigation. Under 2040 cumulative conditions, the Land Use Plan Only Alternative would remain significant and unavoidable with mitigation to significant and unavoidable cumulative pedestrian impacts at a number of sidewalk and corner locations, because improvements beyond those proposed as part of the Plan's street network changes would not be likely or feasible without redesign of roadways that could remove bicycle, transit-only, or mixed-flow travel lanes.

The growth in bicycle travel would be similar under the Land Use Plan Only Alternative, compared to conditions with the Plan. As noted, this alternative would not implement the Plan's bicycle improvements, including new bicycle lanes and cycle tracks, which could reduce the degree to which the Land Use Plan Only Alternative would improve conditions for bicycling, compared to the Plan. It is not expected that the added bicycle trips associated with this alternative would result significant overcrowding of the bicycle facilities and result in hazardous conditions. It is possible that increased congestion associated with the land use growth under this alternative could result in an increased potential for vehicular-bicycle and pedestrian-bicycle conflicts at locations where bicycle lanes are not provided and at locations with existing high collision potential. Thus, for these reasons, the impacts of only development under the Land Use Plan Only Alternative on bicyclists would be significant.

Mitigation Measure

M-ALT-TR-2: Upgrade Additional Central SoMa Area Crosswalks. The SFMTA shall monitor crosswalk operations for deteriorated conditions (i.e., crosswalk operating conditions of LOS E or LOS F, or observations of substantial crosswalk overcrowding), and, as feasible, widen and restripe the crosswalks to the continental design, consistent with the *Better Streets Plan*, at the following locations:

- At the intersection of Fourth/Brannan widen the west crosswalk to 15 feet.
- At the intersection of Fourth/Townsend widen the west crosswalk to 30 feet.
- At the intersection of Fourth/King widen the west crosswalk to 41 feet.

Loading

Unlike the Plan, the Land Use Plan Only Alternative would avoid removal of about 60 existing on-street commercial loading spaces that are currently used by existing businesses, along with a number of on-street passenger loading/unloading zones, to implement the proposed street network changes, nor would other commercial loading spaces and passenger loading zones be unavailable during peak periods, as with the street network changes. The Land Use Plan Only Alternative would result in the same demand for off-street freight loading spaces, on-street commercial loading spaces, and passenger loading/ unloading zones as the Plan. To the extent that loading demand is not accommodated on-site, and could not be accommodated within existing or new on-street commercial loading spaces, double-parking, illegal use of sidewalks and other public space is likely to occur, and such activities could affect traffic and transit operations as well as bike and pedestrian circulation. Double parking could adversely affect local vehicular, transit, and bicycle circulation, particularly on streets with transit-only and bicycle lanes (e.g., Third, Mission, Howard, and Folsom Streets). Thus, this alternative would not avoid the Plan's significant impact related to loading under existing plus Plan conditions. Mitigation Measure M-TR-6a, Driveway and Loading Operations Plan, would manage loading access and loading activities for new development with more than 100,000 square feet of residential or commercial uses, in order to reduce conflicts between commercial loading activities and pedestrians, bicyclists, and vehicles on adjacent streets, and to maximize reliance of on-site loading spaces to accommodate new loading demand. Implementation of Mitigation Measure M-TR-6a, Driveway and Loading Operations Plan, would reduce loading impacts to less-than-significant. Therefore, the Land Use Plan Only Alternative's loading impacts of the Land Use Plan Only Alternative would be less than significant with mitigation. Mitigation Measure M-TR-6b, Accommodation of On-street Commercial Loading Spaces and Passenger Loading/Unloading Zones, would not be required because on-street loading spaces would not be removed.

Parking

Development in the Plan Area under the Land Use Plan Only Alternative would increase parking demand to the same degree as with the Plan, however, this alternative would not include the Plan's street network changes, which would result in permanent removal of about 200 on-street parking spaces on Harrison, Bryant, Brannan, Second, Third, Fourth, and Sixth Streets; and prohibit peak-period use of another approximately 400 on-street spaces. As under the Plan, under this alternative, there could be a shortfall in parking spaces provided relative to the projected demand associated with new development. Nevertheless, because parking impacts from the Plan would be less than significant, the Land Use Plan Only Alternative would also have a less-than-significant impact with respect to parking.

Emergency Vehicle Access

Similar to the Plan, development projects under the Land Use Plan Only Alternative would not introduce unusual design features, and the increases in vehicle, pedestrian and bicycle travel associated with new development projects under this alternative would not substantially affect emergency vehicle access. Furthermore, the Land Use Plan Only Alternative would not include the Plan's proposed street network changes that would result in fewer mixed-flow travel lanes on a number of streets, which, in combination with additional vehicle delay associated with additional vehicle trips generated by development under the Plan, could impede emergency vehicle access in the Plan Area during period of peak traffic volumes. Therefore, the Land Use Plan Only, which would not include any street network changes, would avoid the Plan's significant impact on emergency vehicle access, and **Mitigation Measure M-TR-8**, **Emergency Vehicle Access Consultation**, would not be required.

Construction Impacts

Construction activities associated with the Land Use Plan Only Alternative would be similar to those described for the Plan, although construction of the street network improvements would not occur under this alternative. As described for the Plan, under the Land Use Plan Only Alternative construction of several development projects could occur simultaneously in close proximity to each other, which could result potential disruption of traffic, transit, pedestrian, and bicycle circulation, and which would be considered significant construction-related transportation impacts. **Mitigation Measure M-TR-9, Construction Management Plan and Construction Coordination**, would still apply, and impacts would remain significant and unavoidable with mitigation, as for the Plan. As with the Plan, development under the Land Use Plan Only Alternative, in combination with construction of other projects outside of the Plan Area would not result in significant cumulative construction-related transportation impacts.

Noise and Vibration

Under the Land Use Plan Only Alternative, traffic generated noise under the Existing plus Plan conditions would be less than significant, and consequently, this alternative would avoid the Plan's significant and unavoidable traffic noise impact on Howard Street (west of 10th Street) under Existing plus Plan conditions for the Howard and Folsom Streets two-way option. Under the cumulative conditions with the Land Use Plan Only Alternative, there would be a significant cumulative increase in traffic noise on Fifth Street (between Bryant and Brannan Streets) that would not occur under the Plan; however, the Plan would not make a considerable contribution to this significant cumulative impact, and would therefore result in a less-than-significant cumulative impact. The Land Use Plan Only Alternative would avoid the significant cumulative traffic noise impacts that would occur with the Plan on Howard Street (west of Fifth Street)—including avoiding the Plan's considerable contribution to this significant cumulative traffic noise impacts on Fourth Street (between Bryant and Brannan Streets), Fifth Street (between Brannan and Townsend Streets), and on Bryant Street (east of Fourth Street).

As with the Plan, new noise-generating uses developed under the Land Use Plan Only Alternative would be subject to **Mitigation Measure M-NO-1b**, **Siting of Noise-Generating Uses**, which, along with compliance

with the *San Francisco Building Code, San Francisco Green Building Code,* and Regulation of Noise from Places of Entertainment, would reduce impacts on sensitive land uses to a less-than-significant level. New noise-sensitive land uses under this alternative would be required to comply with existing noise control standards and would not be significantly affected, as under the Plan.

Construction noise and construction vibration associated with the Land Use Plan Only Alternative would be similar in nature to that under the Plan and would be significant. **Mitigation Measures M-NO-2a, General Construction Noise Control Measures,** and **M-NO-2b, Noise and Vibration Control Measures during Pile Driving,** would be applicable this alternative, as would **Mitigation Measures M-CP-3a, Protect Historical Resources from Adjacent Construction Activities,** and **M-CP-3b, Construction Monitoring Program for Historical Resources.** However, if multiple projects were to be under construction simultaneously in close proximity to the same sensitive receptors, the combined effect of these construction noise impacts may result in noise levels for which the available, feasible measures identified in Mitigation Measure M-NO-2a would be insufficient to reduce the construction-related noise impacts to a less-than-significant level. Therefore, potential construction-related noise impacts on adjacent or nearby noise-sensitive receptors would be significant and unavoidable. For the same reasons as for the Plan, cumulative construction noise impacts would be less than significant.

Air Quality and Greenhouse Gas Emissions

While emissions of criteria air pollutants, GHGs, and traffic-generated TACs would be similar to those with the Plan, the Land Use Plan Only Alternative would reduce the increase in congestion along roadways in the Plan Area sufficient to reduce significant congestion-related emissions of the Plan to a less-than-significant level.

As with the Plan, VMT would increase by a lesser percentage (77 percent) than service population (155 percent) and so, at a plan level, the Land Use Plan Only Alternative would not result in significant criteria air pollutant impacts. However, as with the Plan, one or more subsequent individual development projects in the Plan Area could, if large enough, violate an air quality standard, contribute to an existing or projected air quality violation, and/or result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State ambient air quality standard. Mitigation measures would also apply to the Land Use Plan Only Alternative in the form of a project-specific Transportation Demand Management Program (Mitigation Measure M-NO-1a, Transportation Demand Management (TDM) for New Development Projects), which would reduce vehicle trips generated by subsequent development projects and concomitantly reduce emissions of criteria air pollutants and vehicular toxic air contaminants. Other mitigation measures related to operational air quality that are applicable to the Plan would also be applicable to the Land Use Plan Only Alternative, including Mitigation Measures M-AQ-3a, Education for Residential and Commercial Tenants Concerning Low-VOC Consumer Products; M-AQ-3b, Reduce Operational Emissions; and M-AQ-5a, Best Available Control Technology for Diesel Generators and Fire Pumps. However, in the absence of certainty that mitigated emissions from every subsequent development project would be below the applicable significance thresholds, this would be a significant and unavoidable impact of the Land Use Plan Only Alternative.

Since the Land Use Plan Only Alternative does not include the Plan's street network changes, this alternative would not, however, reduce the amount of mixed-flow travel lanes and therefore would not have the potential

to result in increased vehicle congestion from reduced mixed-flow travel lanes, which was found to result in a significant and unavoidable impact with respect to the street network changes proposed under the Plan. Notwithstanding, the overall impact of the Land Use Plan Only on operational air criteria air pollutants would be significant and unavoidable as a result of subsequent development projects.

The proposed Plan's use districts and policy framework would be the same under the Land Use Plan Only Alternative as under the Plan. Moreover, as noted in Table IV.F-6, Consistency of the Plan with Transportation Control Measures of the 2010 Clean Air Plan, in Section IV.F, Air Quality, existing City programs are consistent with many of the 2010 Clean Air Plan's Transportation Control measures. As with the Plan, the Land Use Plan Only Alternative would support the Clean Air Plan's primary air quality, public health, and GHG reduction goals. Therefore, the Land Use Plan Only Alternative would not disrupt or hinder implementation of the Clean Air Plan.

Construction emissions of criteria pollutants from subsequent development projects would be marginally less under the Land Use Plan Only Alternative than under the Plan as the less than significant construction-related emissions from street network improvements would not occur. As with the Plan, construction emissions would be significant and mitigation (**Mitigation Measures M-AQ-4a, Construction Emissions Analysis**, and **M-AQ-4b, Construction Emissions Minimization Plan**), would reduce the impact to a less-than-significant level.

As with the Plan, subsequent development under the Land Use Plan Only Alternative could generate particulates and TACs that would worsen air quality and adversely affect sensitive receptors. However, while the reduced mixed-flow lanes of the Plan would increase congestion and thereby increase vehicle-generated TAC emissions, this Alternative would not include a reduction in mixed-flow travel lanes. Consequently, while increased congestion would still result from general population increase and this would still be a significant impact, the Land Use Plan Only Alternative would not have the potential to contribute to additional congestion as a result of less mixed-flow travel lanes.

Mitigation Measure M-NO-1a, Transportation Demand Management (TDM) for New Development Projects, in Section IV.E, Noise and Vibration, would reduce TACs from vehicle emissions by reducing vehicle trips. Mitigation Measures M-AQ-3b, Reduce Operational Emissions; M-AQ-5a, Best Available Control Technology for Diesel Generators and Fire Pumps; M-AQ-5b, Siting of Uses that Emit Particulate Matter (PM2.5), Diesel Particulate Matter, or Other Toxic Air Contaminants; and M-AQ-5c, Update Air Pollution Exposure Zone for San Francisco Health Code Article 38, would reduce the severity of this impact, but not to a less-than-significant level. A significant and unavoidable impact from TACs generated by the Land Use Plan Only Alternative would result because the degree to which trips (and thereby traffic-generated emissions) could be reduced by Mitigation Measure M-NO-1a cannot be reliably estimated. Additionally, vehicle emissions are regulated at the State and federal level and local jurisdictions are preempted from imposing stricter emissions standards for vehicles, and no other feasible mitigations for mobile source emissions are available.

Construction-related emissions of particulates and TACs under the Land Use Plan Only Alternative would be marginally less than the Plan as the less-than-significant construction-related emissions from street network improvements would not occur, and these emissions would likewise be mitigated to a less-than-significant

level with implementation of Mitigation Measure M-AQ-6a, Construction Emissions Minimization Plan, and M-AQ-6b, Implement Clean Construction Requirements.

Impacts related to greenhouse gas emissions would be less than significant, as with the Plan, given that subsequent development projects would be required to comply with the City's Greenhouse Gas Reduction Strategy.

Hydrology and Water Quality (Sea Level Rise and Combined Sewer System)

Like the Plan, the Land Use Plan Only Alternative would not alter the northern shoreline of Mission Creek, which provides inundation pathways for flooding from future sea level rise; nor would it raise or lower the ground surface in a manner that would redirect flood flows. As with the Plan, development under the Land Use Plan Only Alternative could be affected by future sea level rise adjacent to the Plan Area. However, consistent with the California Supreme Court's decision in *California Building Industry Association v. Bay Area Air Quality Management District,* this would not be a significant effect under CEQA, because development pursuant to the Land Use Plan Only Alternative would not significantly exacerbate this existing environmental hazard. As under existing conditions, projects in areas that are currently prone to flooding from the combined sewer system during wet weather would be reviewed by the SFPUC during the project approval process and may require additional actions such as incorporation of a pump station for sewage flows, raised elevation of entryways, special sidewalk construction, and deep gutters. These measures would reduce the potential for localized flooding. Therefore, impacts of the Land Use Plan Only Alternative related to flooding would be less than significant, as under the Plan.

The Land Use Plan Only Alternative would result in a similar amount of development as the Plan; both wastewater generation and stormwater flows would be similar. As with the Plan, the reduction in stormwater flows due to required stormwater reduction measures is expected to offset estimated increases in wastewater flows during wet weather such that there would not be an increase in wet weather combined sewer discharges, and impacts related to an increase in combined sewer discharges under the Land Use Plan Only Alternative would be less than significant.

Issues Analyzed in the Initial Study

Impacts Related to the Intensity of Development

Given that the Land Use Plan Only Alternative would have the same number of households and residential population of the Plan, it is expected the demand for, and associated impacts related to, recreation and public space would be the same as the Plan. Similarly, given that the Land Use Plan Only Alternative would have the same number of households and commercial use intensity than the Plan, the overall demand for, and associated impacts to, utilities and service systems, and public services would be similar to those of the Plan; all these impacts would be less than significant, as with the Plan.

Impacts Related to Site-Specific Conditions

Impacts related to site-specific conditions, such as those related to biology, geology and soils, hydrology and water quality, and hazardous materials would be similar to those of the Plan because it can be assumed that

many, if not most, of the same sites would be affected by subsequent future development projects. It is not anticipated that foundation systems (and, therefore, ground-disturbing activities) would be substantially different than with development pursuant to Plan, because the Land Use Plan Only Alternative would allow the construction of high-rise buildings on the same sites. Therefore, impacts related to geology and soils would be the same as under the Plan. **Mitigation Measures M-BI-1, Pre-construction Bat Surveys**, and **M-HZ-3, Hazardous Building Materials Abatement** would be applicable, as with the Plan.

As with the Plan, this alternative would have less-than-significant impacts related to mineral and energy resources and no impacts on agricultural or forest resources, because these resources are not present within the Plan Area.

Project Objectives

The Land Use Plan Only Alternative would meet most of the eight project objectives of the Plan because it would allow for development on the same sites and at the same height and density as the Plan, and overall projected residential and employment growth under this alternative would be the same as the under the Plan. However, since the Land Use Plan Only Alternative would not provide the street network changes proposed under the Plan, the street network under this alternative would not as effectively prioritize walking, bicycling and transit to the same extent as the Plan, and therefore, would not meet Objective 4.

VI.G Environmentally Superior Alternative

Section 15126.6(e)(2) of the CEQA Guidelines requires the identification of an environmentally superior alternative to the proposed project. If the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.

Generally speaking, the differences in impacts between the alternatives and the Plan are because the alternatives would result in less total development potential than under the Plan (as is the case for Alternatives 1 through 4) or because the alternatives do not include the proposed street network changes (as is the case for Alternatives 1 and 5).

The No Project Alternative would result in less new construction and new development than the Plan or the other alternatives. Consequently, the No Project Alternative's impacts related to construction and operation of new developments would also be less than the Plan or the other alternatives. The No Project Alternative would avoid seven of the significant and unavoidable Plan and/or cumulative impacts: Impact C-LU-1 (cumulative conflicts with *General Plan* policy regarding traffic noise); Impact TR-6 and Impact C-TR-6 (Plan and cumulative impacts to commercial and passenger loading/unloading); Impact TR-9 (Plan construction-related transportation impacts); Impact NO-1 (Plan operational traffic noise), Impact NO-2 (Plan construction noise) and Impact WI-1 (Plan wind impact). The No Project Alternative would also avoid the need to mitigate Impact TR-8 and Impact C-TR-8 (Plan and cumulative impacts to emergency vehicle access). This alternative would, however, introduce a new significant and unavoidable impact to pedestrian capacity (Impact TR-4) that would not occur under the Plan.

As discussed under Section VI.B, above, the No Project Alternative would not meet most of the basic project objectives. Furthermore, per CEQA Guidelines Section 15126.6(e)(2), if the environmentally superior

alternative is the No Project Alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.

Of the remaining four alternatives (Reduced Heights Alternative, Modified TODCO Plan, Land Use Variant, and Land Use Plan Only Alternative), the Land Use Plan Only Alternative is considered the environmentally superior alternative. The Land Use Plan Only Alternative would result in a similar amount of new construction and new development compared to the Plan. By not implementing the street network improvements proposed by the Plan, however, this alternative would avoid a number of associated significant secondary effects related to traffic noise, on-street loading, and emergency vehicle access. Specifically, the Land Use Plan Only Alternative would avoid eight of the significant and unavoidable Plan and/or cumulative impacts: Impact LU-2 and Impact C-LU-1 (Plan and cumulative conflicts with General Plan policy regarding traffic noise); Impact NO-1 and Impact C-NO-1 (Plan and cumulative operational traffic noise); Impact TR-6 and Impact C-TR-6 (Plan and cumulative reduction in on-street loading supply); and Impact TR-8 and Impact C-TR-8 (Plan and cumulative impacts to emergency vehicle access). The absence of the Plan's street network improvements under this alternative could result in incrementally higher VMT than the Plan, and incrementally greater potential for traffic/bicycle/pedestrian conflicts compared to the Plan. Such effects would, however, continue to be less than significant, as under the Plan. The Land Use Plan Only Alternative would result in other significant effects related to transit and pedestrians. These significant effects would require implementation of mitigation measures M-ALT-TR-1, Upgrade Transit-Only Lanes on Third Street, and M-ALT-TR-2, Upgrade Additional Central SoMa Area Crosswalks.

As with the No Project Alternative, the Reduced Heights Alternative, the Modified TODCO Plan, and the Land Use Variant all would, in varying degrees, result in lower development intensity than the Plan. As such, many of the construction and operational effects of these alternatives would be less than the Plan. However, the Reduced Heights Alternative, the Modified TODCO Plan, and the Land Use Variant would not avoid any of the significant and unavoidable environmental effects associated with the Plan. With all of these lower development intensity alternatives, to the extent that the demand for additional developed space would be met elsewhere in the Bay Area, employees in and residents of such development could potentially generate substantially greater impacts on transportation systems (including vehicle miles traveled), air quality, and greenhouse gases than would be the case for development in the more compact and better-served-by-transit Plan Area. This would be particularly likely for development in more outlying parts of the region where fewer services and less transit access is provided. While it would be speculative to attempt to quantify or specify the location where such development would occur and the subsequent impacts thereof, it is acknowledged that these lower intensity alternatives would incrementally reduce local impacts in the Plan Area and in San Francisco, while potentially increasing regional emissions of criteria air pollutants and greenhouse gases, as well as regional traffic congestion. They could also incrementally increase impacts related to "greenfield" development on previously undeveloped locations in the Bay Area and, possibly, beyond.

VI.H Alternatives Considered but Rejected

As discussed under Section IV.D, Transportation and Circulation, the TODCO Group submitted its TODCO Plan to the City for consideration in October 2016 after the draft Central SoMa Plan was revised in August 2016. All aspects of the October 2016 TODCO Plan were included and analyzed as the "Modified TODCO Plan" in this Alternatives Chapter, with the exception of the TODCO Plan's proposed height limits. The October 2016 TODCO Plan proposed changes in height limits at certain major development sites within the Central SoMa Plan Area that would be greater than that proposed for those same sites in the Central SoMa Plan. Specifically, under the TODCO Plan, the proposed 250-foot height limits at the Academy of Art Student Housing site and the Fourth and Harrison Streets site would be greater than the height limit for those sites proposed under the Central SoMa Plan (160 feet, and 240 feet, respectively). In addition, at the Second and Harrison Street site, the proposed height limits of 400 feet under the TODCO Plan would be greater than the 350-foot height limit for that site proposed under the Central SoMa Plan.

Given that the TODCO Plan proposes higher height limits on two parcels on Harrison Street as compared to the Plan, shadow effects on Yerba Buena Gardens, Alice Street Community Gardens, Jessie Square, Yerba Buena Lane, and Mint Plaza may be greater than under the Plan. These higher heights could also result in greater pedestrian-level winds. Overall, the Modified TODCO Plan's higher height limits on certain parcels could result in greater wind and shadow impacts than the Plan, the No Project Alternative, or the Reduced Heights Alternative. For this reason, the TODCO Plan was rejected from further analysis in this EIR.

However, a modified version of the TODCO Plan is analyzed in Section IV.D in this EIR, as Alternative 3: Modified TODCO Plan. Under the Modified TODCO Plan, there would be no height limit increases for any new development above the height limits proposed under the Central SoMa Plan.

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